

- i. Please explain the purpose of this hose. **It is how we deliver water to the evaporator**
  - ii. Provide the most recent sewer permit from the city of Milwaukee. **We do not have a sewer permit and to our understanding none is required.**
- 2. Lead dross and other Lead contaminated wastes are sent for recycling. **Please see Dan Askins answers**
  - a. Provide the contracts that exist with each recycler that accepts Tulip's lead waste.
  - b. If not included in the contracts, provide an explanation of how lead-contaminated wastes such as filters, dirt or oil dry are eligible for recycling. What process is used to reclaim the lead from these materials?
  - c. Provide documentation that shows the wastes were not speculatively accumulated at Tulip for 2014 and 2015.
- 3. During the inspection, we identified one partwasher near the spray booth on the far north end of the facility. During a review of manifests, however, it appeared that there were at least two different partwashers being used at the facility. One waste stream was sent off-site as lead-contaminated hazardous waste carrying the D008 hazardous waste number. The second waste stream was managed as non-hazardous.
  - a. How many partwashers are utilized at this facility? **3**
  - b. Where are these partwashers located (provide general location such as "Cold-Form.") **Maintenance and Paint Line**
  - c. Provide the waste determination documentation for each parts washer. **I will have to find a manifest from the waste hauler**

**5/22/15: Please provide examples of your most recent shipping documents for the wastes generated by each partwasher. I would expect to see three different shipping documents. Be sure to add a note on the document stating where the partwashers are located and what solvent is used.**

**5/22/15: Please also provide documentation that clearly states why the wastes from each partwasher is hazardous or is non-hazardous (waste determinations). As I mentioned before, these documents can include sample analysis results or a description of generator knowledge.**

- 4. During the inspection, I observed a spill of the coating for lead bushings underneath the spray booth. An employee had poured solvent on the spill in order to loosen it to clean it up.
  - a. Provide an MSDS for the solvent used to clean the spill. **Orange Tough 40 attached.**
  - b. Provide waste determination documentation for the clean-up residuals. **I have to try to find information on this**
  - c. If applicable, provide the shipping manifest that accompanied the waste. **Not applicable**

**5/22/15: Please explain how the clean-up residuals were managed (e.g., general trash, combined with another waste, still in storage, etc.)**

**5/22/15: I am still requesting information responsive to 4.b. As noted above, a waste determination includes sample analytical results or a write-up of generator knowledge explaining why the material is either hazardous or not.**

- 5. During the records review portion of the inspection, I noticed two manifests initiated on 7/10/14 and 7/11/14 showing shipments of D001 hazardous waste described as isoparaffinic hydrocarbons and contaminated used oil. **See attached**
  - a. Identify the source of this waste.
  - b. Provide waste determination documentation for this waste.
  - c. The LDR notices attached to these manifests were marked "yes" for Underlying hazardous constituents, though none were identified. Identify the UHCs applicable to this waste. **If not previously answered, please explain in more detail what you are asking for.**

5/22/15: Underlying hazardous constituents are contaminants in the waste stream that are not in sufficient quantity to be included in the characterization of the waste, but are still present and need to be treated to certain levels before the waste can be land-filled. For example, if the waste stream contains lead, but not in sufficient quantities to be included as a characteristic on the manifest under D008, it needs to be included, not on the manifest, but on the land disposal restriction form as an element that must be treated.

These are all the questions that I have at this moment. I appreciate your time and attention to this matter. Please call or email me if you have any questions or concerns regarding this email.

Thank you,  
Brenda

---

Brenda Whitney  
Environmental Engineer  
U.S. EPA - Region 5  
77 W. Jackson Boulevard, LR-8J  
Chicago, Illinois 60604  
312-353-4796 (ph)  
312-385-5505 (fax)

## Whitney, Brenda

---

**From:** George Koleas <gkoleas@tulipcorp.com>  
**Sent:** Thursday, May 14, 2015 2:41 PM  
**To:** Whitney, Brenda  
**Subject:** RE: EPA inspection at Tulip Corp. on March 20, 2015  
**Attachments:** EPA 5-14-2015-05142015153216.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Attached are more documents,

In questions 1 C, 1 F and 3 C, you ask for Waste Determination Documentation. I cannot find this. Would Crystal Clean have this?

In question 1 E ii you ask for total halogen and lead content. In the document I sent previously from Crystal Clean there was a breakdown and I did not see halogen or lead content.

I can ask Crystal Clean, but I am not sure I know what to ask for. Can you help me by writing out what you need and I will try to get it for you.

---

**From:** George Koleas  
**Sent:** Monday, May 11, 2015 7:16 AM  
**To:** 'Whitney, Brenda'  
**Subject:** RE: EPA inspection at Tulip Corp. on March 20, 2015

Thank you.

---

**From:** Whitney, Brenda [<mailto:whitney.brenda@epa.gov>]  
**Sent:** Monday, May 11, 2015 7:18 AM  
**To:** George Koleas  
**Subject:** RE: EPA inspection at Tulip Corp. on March 20, 2015

Hello George,

Yes, of course, you can submit any additional information by May 15<sup>th</sup>. If you need more time, just let me know, and I will see what I can do for you.

Thanks,  
Brenda Whitney

---

**From:** George Koleas [<mailto:gkoleas@tulipcorp.com>]  
**Sent:** Friday, May 08, 2015 4:18 PM  
**To:** Whitney, Brenda  
**Cc:** [dan@esca-tech.com](mailto:dan@esca-tech.com)  
**Subject:** RE: EPA inspection at Tulip Corp. on March 20, 2015

Please add the attached to the documents I have sent.

**From:** George Koleas  
**Sent:** Friday, May 08, 2015 3:20 PM  
**To:** 'Whitney, Brenda'  
**Cc:** [dan@esca-tech.com](mailto:dan@esca-tech.com)  
**Subject:** RE: EPA inspection at Tulip Corp. on March 20, 2015

Attached is the response from Dan Askin to your questions. Attached is also documents that I believe answer some of the questions that you asked me during your inspection. Please also see the answers below.

I am still searching for information as indicated in the answers to the questions below. May I still have until the end of next week, May 15, to submit these documents?

**From:** Whitney, Brenda [<mailto:whitney.brenda@epa.gov>]  
**Sent:** Thursday, April 23, 2015 3:19 PM  
**To:** [dan@esca-tech.com](mailto:dan@esca-tech.com)  
**Cc:** George Koleas  
**Subject:** Re: EPA inspection at Tulip Corp. on March 20, 2015

Dear Mr. Askin,

I am a RCRA inspector with the US EPA, and I recently conducted an inspection at Tulip Corporation in Milwaukee. I was escorted by George Koleas (copied on this e-mail), Joey Muhammad, and Terry Evraets. Mr. Koleas referred me to you for questions that we could not fully answer at the time of the inspection. I had spoken with you five years ago regarding an inspection I conducted at this facility at that time, you may recall. My purpose for contacting you is simply for information gathering purposes. If at all possible, please respond to this email by May 8, 2015.

1. I understood from the inspection that used oil generated from the injection molding presses and from the cold-form presses is collected for processing in the oil/water separator in the "Old Boiler" room.
  - a. What percentage of oil that is recovered in this process is used back in the facility? 100%
  - b. Does the oil/water separator generate a sludge that must be removed from the tank? No
    - i. If yes, how is this sludge managed?  
Provide information including waste determination documentation and an example of a shipping manifest or document for this material.
  - c. Does the oil/water separator have filters to collect sediment? Yes
    - i. If yes, how are these filters managed? Disposed of through our waste hauler  
Provide information including waste determination documentation and an example of a shipping manifest or document for this material. I am looking for ne to send to you.
  - d. I was informed during the inspection that the water fraction is transferred from the separator to a 450-gallon holding unit (tank or tote) and is taken off-site by Crystal Clean as oily water. Either confirm or correct this statement. The water is evaporated. If there is more than our capacity to evaporate, it is taken away by crystal clean.
  - e. Is used oil ever sent off-site without first being processed in the oil/water separator? No
    - i. If yes, why would it not be processed on-site?
    - ii. Is it managed as used oil? Yes  
Provide documentation of total halogen and lead content, as well as an example of a shipping manifest or document for this material. I will have to find a manifest from the waste hauler



- f. Explain how the waste stream "Water contaminated with oil" is managed. For example, is it processed through the oil/water separator or is it sent off-site without being processed? Processed through the oil water separator
    - i. Provide information including waste determination documentation and an example of a shipping manifest or document for this material, if available. I will have to find a manifest from the waste hauler
  - g. Mr. Muhammad explained during the inspection that process waters are not directly discharged to the sewer. At the time of the inspection, I observed a hose positioned over the drain opening closest to the stairs in the Old Boiler room.
    - i. Please explain the purpose of this hose. It is how we deliver water to the evaporator
    - ii. Provide the most recent sewerage permit from the city of Milwaukee. We do not have a sewer permit and to our understanding none is required.
2. Lead dross and other Lead contaminated wastes are sent for recycling. Please see Dan Askins answers
    - a. Provide the contracts that exist with each recycler that accepts Tulip's lead waste.
    - b. If not included in the contracts, provide an explanation of how lead-contaminated wastes such as filters, dirt or oil dry are eligible for recycling. What process is used to reclaim the lead from these materials?
    - c. Provide documentation that shows the wastes were not speculatively accumulated at Tulip for 2014 and 2015.
  3. During the inspection, we identified one partwasher near the spray booth on the far north end of the facility. During a review of manifests, however, it appeared that there were at least two different partwashers being used at the facility. One waste stream was sent off-site as lead-contaminated hazardous waste carrying the D008 hazardous waste number. The second waste stream was managed as non-hazardous.
    - a. How many partwashers are utilized at this facility? 3
    - b. Where are these partwashers located (provide general location such as "Cold-Form.") Maintenance and Paint Line
    - c. Provide the waste determination documentation for each parts washer. I will have to find a manifest from the waste hauler
  4. During the inspection, I observed a spill of the coating for lead bushings underneath the spray booth. An employee had poured solvent on the spill in order to loosen it to clean it up.
    - a. Provide an MSDS for the solvent used to clean the spill. Orange Tough 40 attached.
    - b. Provide waste determination documentation for the clean-up residuals. I have to try to find information on this
    - c. If applicable, provide the shipping manifest that accompanied the waste. Not applicable
  5. During the records review portion of the inspection, I noticed two manifests initiated on 7/10/14 and 7/11/14 showing shipments of D001 hazardous waste described as isoparaffinic hydrocarbons and contaminated used oil. See attached
    - a. Identify the source of this waste.
    - b. Provide waste determination documentation for this waste.
    - c. The LDR notices attached to these manifests were marked "yes" for Underlying hazardous constituents, though none were identified. Identify the UHCs applicable to this waste. If not previously answered, please explain in more detail what you are asking for.

These are all the questions that I have at this moment. I appreciate your time and attention to this matter. Please call or email me if you have any questions or concerns regarding this email.

Thank you,  
Brenda

---

Brenda Whitney  
Environmental Engineer  
U.S. EPA - Region 5  
77 W. Jackson Boulevard, LR-8J  
Chicago, Illinois 60604  
312-353-4796 (ph)  
312-385-5505 (fax)

HERITAGE-CRYSTAL CLEAN - BILL OF LADING

QUESTION 1C 10f2

HCC Use Loc: MILWAUKEE Route: MILWAUKEE ROUTE 4 Page 1 of 1  
 Oct #: 2598701 PB: 130303 WO #: 00-00768MV

Shipper's Name And Mailing Address  
 TULIP CORP.  
 714 EAST KEEFE AVENUE  
 MILWAUKEE, WI 53212

Shipper EPA ID  
 WID006113013  
 Shipper State ID

Generator Phone: (414) 965-3120 X 226

Transporter 1 Company Name  
 HERITAGE-CRYSTAL CLEAN, LLC

Transp 1 EPA ID  
 ILR000130062

Transp 1 State ID

Transp 1 Phone  
 (847) 836-5670

Transporter 2 Company Name

Transp 2 EPA ID

Transp 2 State ID

Transp 2 Phone

Transporter 3 Company Name

Transp 3 EPA ID

Transp 3 State ID

Transp 3 Phone

Receiving Facility  
 HERITAGE-CRYSTAL CLEAN, LLC.  
 1560 WEST RAYMOND ST  
 INDIANAPOLIS, IN 46221

Facility EPA ID  
 ILR000130062

Facility State ID

Facility Phone  
 (800) 424-9300 X

24hr Emergency Phone:  
 800-424-9300, "1"

Shipping Description		Container No.	Type	Total Qty	Unit
A	NON-DOT/RCRA REGULATED, (ABSORBENT & OIL)	001	DM	0050	G
B	NON-DOT/RCRA REGULATED, (NON HAZ FILTER PAPER)	001	DM	0050	G
C	NON-DOT/RCRA REGULATED, (EMPTY DRUM)				

Special Handling Instructions, Additional Information and Handling Codes (as Applicable)

- A) CC:73254-2 TSD:72672-2 (1014A,952P) S01 (\*3PFB)
- B) CC:73254-7 TSD:72672-8 (1014A) S01 (\*3PFB)
- C) CC:73254-10-17 TSD:10-17 (1080A) S01

GENERATOR'S CERTIFICATION:

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transport according to the applicable regulations of DOT, as required.

Printed/Typed Name  
 Keith Godfrey

Transporter 1 Acknowledgement of Receipt Materials

Printed/Typed Name  
 Keith Godfrey

Transporter 2 Acknowledgement of Receipt Materials

Printed/Typed Name  
 Keith Godfrey

Transporter 3 Acknowledgement of Receipt Materials

Printed/Typed Name

Additional Description / Discrepancies

GENERATOR REQUESTS RETURN COPY

Receiving Facility: Certification of receipt of waste materials covered by this bill of lading.

Printed/Typed Name  
 CELEST WHICKER

Signature

Date

3-23-15





# HERITAGE-CRYSTAL CLEAN - BILL OF LADING

HCC Use Loc: MILWAUKEE Route: MILWAUKEE ROUTE 4 Page 1 of 1  
 Doc #: 2472310 - [ ] PE:141112 WO #: 00-006W5E9

Shipper's Name And Mailing Address  
 TULIP CORP.  
 714 EAST KEEFE AVENUE  
 MILWAUKEE, WI 53212

Shipper EPA ID  
 WID006113013  
 Shipper State ID

Generator Phone: (414) 963-3120 X 226

Transporter 1 Company Name  
 HERITAGE-CRYSTAL CLEAN, LLC

Transp 1 EPA Id  
 ILR000130062

Transp 1 State Id

Transp 1 Phone  
 (847) 836-5670

Transporter 2 Company Name

Transp 2 EPA Id

Transp 2 State Id

Transp 2 Phone

Robbie D. Wood Jr.  
 Transporter 3 Company Name

ALD 11/17/2011  
 Transp 3 EPA Id

Transp 3 State Id

Transp 3 Phone

Receiving Facility  
 HERITAGE-CRYSTAL CLEAN, LLC.  
 1560 WEST RAYMOND ST  
 INDIANAPOLIS, IN 46221

Facility EPA Id  
 ILR000130062  
 24Hr Emergency Phone:  
 800-434-9900, "1"

Facility State Id

Facility Phone  
 (800) 424-9300 X

## Shipping Description

	Container No.	Type	Total Qty	Unit Wt/Val
A NON-DOT/RCRA REGULATED, (ABSORBENT & OIL)	001	DM	0050	6
B NON-DOT/RCRA REGULATED, (NON HAZ FILTER PAPER)	001	DM	0050	6
C NON-DOT/RCRA REGULATED, (EMPTY DRUM)				

## Special Handling Instructions, Additional Information and Handling Codes (as Applicable)

- A) CC:73254-2 TSD:72672-2 (1014A,952P) S01 (\*3PFB)
- B) CC:73254-7 TSD:72672-8 (1014A) S01 (\*3PFB)
- C) CC:73254-10-17 TSD:10-17 (1080A) S01

## GENERATOR'S CERTIFICATION:

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transport according to the applicable regulations of DOT, as required.

John J. Mahoney  
 Printed/Typed Name

Signature

Date

Transporter 1 Acknowledgement of Receipt Materials

Keith Godfrey  
 Printed/Typed Name

Signature

Date

Transporter 2 Acknowledgement of Receipt Materials

Jason Carver  
 Printed/Typed Name

Signature

Date

Transporter 3 Acknowledgement of Receipt Materials

Printed/Typed Name

Signature

Date

## Additional Description / Discrepancies

GENERATOR REQUESTS RETURN COPY

Receiving Facility: Certification of receipt of waste materials covered by this bill of lading.


Celest Whicker  
 Printed/Typed Name

Signature

Date





McLoughlin

APP ID #	SYCNK	WORK ORDER #	SYN REQ	AGMT #	PURCHASE ORDER #	WAGE
03197	16	693291				
STATE COST ID #	ROUTE			FEDERAL EMP ID #		
	Milwaukee VAC 4-4					
GEN STATUS	SMALL EMP #		COMMENTS			
DDMB WORK:						
6C83P				693291		
				NOC		

CUSTOMER/SHIPPER: Tulip CORP. 714 E KEEFE AVE. Milwaukee, WI 53212 Contact Name: JOE MUHAMMAD	DESTINATION: 1005 Richards Rd Highland, WI 53029 Phone Number: 262.367.2149
--	---

**CARRIER: HERITAGE-CRYSTAL CLEAN, LLC      EPA ID #: ILR 000 130 062      Phone Number: (877) 938-7948**

10 GAL DRUMS	30 GAL DRUMS	55 GAL DRUMS	PROPER SHIPPING NAME	TOTAL	UNITS
		01	NONDOT RCRA Regulated (Dry matter mixture)		

<p>This is to certify that the above listed materials are properly identified, measured, packaged, marked, and labeled and are in compliance with the applicable requirements of the Environmental Protection Agency, as required. (Additional test results may be included here if they have been received in the past 90 days (unless otherwise specified).)</p>	
<p>PD: </p> <p>Environmental Manager</p>	<p>4-18-14</p> <p>Date</p>
<p>PD: </p> <p>WDC Center</p>	<p>4-18-14</p> <p>Date</p>

SUMMARY OF CHARGES	
TOWNS SERVICE	
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WS #	PROD. CODE	DESCRIPTION	PROD. GALS.	UNIT	SR	NEXT SYC.	LOCATION COMMENTS	UNIT PRICE	QTY.	TOTAL CHARGE
	1101	liquids						1.01	600	606.00
	1103	Track						195.82	1	195.82
	1110	fuel						36.27	1	36.27
								TAX		
								SERVICE & TOTAL		848.19

[illegible][illegible]






# WORK ORDER

HERITAGE-CRYSTAL CLEAN, LLC  
(877) 938-7948

MILWAUKEE

EMP ID #	SVC WK	WORK ORDER #	SVC REQ	AGRM #	PURCHASE ORDER #	PAGE
02917	12/24	00-006NX46	173810	504406		1 of 1
CCMS CUST ID #	ROUTE		FEDERAL EPA ID #			
72941	MILWAUKEE - VAC 4-4		W1D006113013			
COMMENTS			GEN. STATUS	STATE EPA ID #		
EMERGENCY: 800-424-8300			SQG			
MILWAUKEE VAC (WAF 10/12)						



CUSTOMER/SHIPPER: TULIP CORP.  
714 EAST KEEFE AVENUE  
MILWAUKEE, WI 53212

DESTINATION: HERITAGE-CRYSTAL CLEAN, LLC  
1005 RICHARDS RD. UNIT C  
HARTLAND, WI 53029

Contact Name: JOE MUHAMMAD

(414)763-3120

Phone Number: (262)367-2149

CARRIER: HERITAGE-CRYSTAL CLEAN, LLC

EPA ID #: ILR 000 130 062

Phone Number: (877) 938-7948

## BILL OF LADING

16 GAL DRUMS	30 GAL DRUMS	55 GAL DRUMS	PROPER SHIPPING NAME	TOTAL	UNITS
		01	NON-FLAMMABLE, (USED OIL), (oil/water mixture)	709	g

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transport according to the applicable regulations of the Department of Transportation, as required. I also certify that neither hazardous waste, nor PCBs have been mixed with the used oil and/or parts cleaner solvent (if applicable).

Per:   
Customer/Shipper

Date: 10/17/14

Per:   
HCC/Carrier

Date: 10/17/14

## SUMMARY OF CHARGES

### TODAY'S SERVICE

WS #	PROD. CODE	DESCRIPTION	RTD. GALS.	UNIT	SI	NEXT SVC.	LOCATION COMMENTS	UNIT PRICE	QTY.	TOTAL CHARGE
73254-10-34	1101	VAC LIQUID PICKUP		NONE	4	43		\$1.01	709	716.89
73254-12	1101	VAC LIQUID PICKUP		NONE	4	43		\$1.01	0	
	1103	VAC TRUCK STOP FEE (3 HR)		NONE	4	43		\$195.82	1	\$195.82
	1102	VAC SOLIDS PICKUP		NONE	4	43		\$3.55	0	
	1110	FUEL SURCHARGE - VAC		NONE	4	43		\$36.27	1	\$36.27

\$0.00

TAX

\$222.09

SERVICE SUBTOTAL

948.18

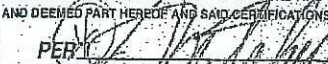
## PRODUCTS

### PRODUCT DESCRIPTION:

UNIT PRICE	QTY.	CHARGE
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PRODUCT SALES TAX

SUBTOTAL PRODUCT & TAX

MACHINE INSPECTION	SERVICE/PRODUCTS CHARGE SUMMARY
Cleanliness G P Lamp Assembly G P Drum Condition G P Fusible Link Installed G P Lid Unobstructed G P Properly Grounded G P Local Phone # affixed G P Decals in Place G P	CUSTOMER HEREBY VERIFIES THAT THE ABOVE SERVICES WERE PERFORMED AND THAT SAID SERVICES AND THE CHARGES THEREFORE ARE HEREBY ACCEPTED. CUSTOMER ALSO HEREBY REAFFIRMS THE ACCURACY AND COMPLETENESS OF ALL INFORMATION CONTAINED IN THIS WORK ORDER AND ALL DOCUMENTATION PREVIOUSLY SUBMITTED TO HCC. THIS WORK ORDER IS DEEMED PART OF THE SERVICE AGREEMENT BETWEEN HERITAGE-CRYSTAL CLEAN, LLC AND THE CERTIFICATIONS CONTAINED THEREIN CONCERNING THE MATERIALS TO BE HANDLED AND THE SERVICES TO BE PROVIDED ARE INCORPORATED HEREIN BY REFERENCE AND DEEMED PART HEREOF AND SAID CERTIFICATIONS ARE DEEMED REMADE FOR THE SERVICES COVERED BY THIS WORK ORDER. PER:  DATE: 10/17/14
	TODAY'S SERVICE
	PRODUCT & TAX
	TOTAL AMOUNT DUE 948.18
	TOTAL REMITTANCE
	CHECK NUMBER





3747 North Booth Street  
Milwaukee, Wisconsin 53212-1603

Phone: (414) 962-5323  
Fax: (414) 962-7003  
www.esca-tech.com

May 6, 2015

To: Ms Brenda Whitney  
United States Environmental Protection Agency  
Region 5, LR-8J  
77 West Jackson Boulevard  
Chicago, IL 60604

From: Dan Askin

cc: George Koleas

Re: Tulip response regarding lead recycling questions contained in your email dated April 23, 2015

2. Lead dross and other Lead contaminated wastes are sent for recycling.
  - a. Provide the contracts that exist with each recycler that accepts Tulip's lead waste.
  - b. If not included in the contracts, provide an explanation of how lead-contaminated wastes such as filters, dirt or oil dry are eligible for recycling. What process is used to reclaim the lead from these materials?
  - c. Provide documentation that shows the wastes were not speculatively accumulated at Tulip for 2014 and 2015.

There are no recycling contracts used for the recycling of lead materials. When we have a truck load of lead materials to be recycled, we contact several secondary lead recycling facilities in the Midwest and ask for bids. We do not store the material after we accumulate a full truck load. The material is sold to the bidder who provides the best price.

#### **Recycling of Plant Scrap and Waste:**

Most of the waste materials generated in Tulip's manufacturing processes can be beneficially recycled. As a matter of emphasis 100% of the lead alloys processed and more than 85% of the polypropylene processed at Tulip's Keefe Avenue plant is recycled material.

There are basically three types of furnaces used to smelt lead bearing materials. The blast furnace, rotary furnace and reverb furnace. The furnace feed for a lead smelting charge for all three includes the following materials:

- a) The lead bearing material
- b) Carbon, coke or other carbon or hydrocarbon source which reduces the metal oxides to metal via an endothermic reaction.
- c) Iron, steel or other iron source which is required for formation of the slag.
- d) Silica, sand or glass which is also required for formation of the slag.

What the smelter cannot tolerate in the furnace feed is aluminum metal. Aluminum will and does cause the furnace to explode, even in small amounts.

Another aspect that enters into this is the lead content of the lead bearing material. In general what we have found is that if the material contains 50% or more recoverable metals, then the smelter will pay for the material. If it contains less than 50%, then the smelter charges for processing the material. However, since Tulip is a significant customer of the smelters in the US, the recycling facilities will pay Tulip for material that contains more than about 27% recoverable metals.



3747 North Booth Street  
Milwaukee, Wisconsin 53212-1603

Phone: (414) 962-5323  
Fax: (414) 962-7003  
www.esca-tech.com

One other factor is how the smelter charges the furnace. In my experience material sent to the smelter in steel drums up to 250 liters are fed to the furnace directly, without opening the drum to remove the material first.

We have classified each of the lead bearing waste streams according to these criteria. For example:

- a) Respirator cartridges are composed of a plastic case (hydrocarbons provide carbon and oxygen to reduce metal oxides); the filter media is a borosilicate glass (silica source) and glued together with a urethane glue (hydrocarbon).
- b) Silicone respirator face pieces: the silicone rubber is a silica source; the straps are cotton and or polyester and plastic clips and valves (hydrocarbons).
- c) Disposable respirator face pieces are made from either or both a borosilicate glass fiber and / or cellulose paper with typically an acrylic binder. The straps are hydrocarbons, and the aluminum nose clips are a problem; and would have to be removed in order to smelt these face pieces. But the price of scrap aluminum is also good.
- d) Floor sweepings contain sweeping compound (sawdust) and recoverable lead.
- e) Dust collector dust contains 65-75% recoverable lead metal and alloys.
- f) Used air filters, e.g. baghouse bags are polyester (hydrocarbon source) and generally consist of 50 – 85% by weight recoverable lead.

Tulip operates its lead recycling program according to:

40 CFR Part 266,	Standards for the Management of Specific Hazardous Wastes and Specific Types of Hazardous Waste Management Facilities
Appendix XI	"Lead Bearing Materials that May be Processed in Exempt Lead Smelters"
Section A:	Exempt Lead Bearing Materials That May be Processed in Exempt Lead Smelters
Section B:	Exempt Lead Bearing Materials When Generated or Originally Produced by Any Industry

This regulation provides an exemption from hazardous waste regulations for the list of materials below. This exemption is: "When the following materials are properly classified, packaged and transported and are reclaimed in a lead smelting furnace they are exempt from the hazardous waste rules with respect to manifesting, storage and reporting. They are still subject to rules governing the transportation and storage of hazardous materials."

The term "Exempt lead smelter" simply means that the smelter has the correct permits to recycle lead.

List A: Exempt materials generated or produced by any lead associated industry. Lead associated industries are lead smelters, lead acid battery manufacturing and lead chemical manufacturing and producers of battery terminals such as Tulip.

Acid dump / fill solids	Sump mud
Materials from laboratory analysis	Acid filters
Baghouse bags	
Clothing (e.g. coveralls, aprons, shoes, hats, gloves)	
Sweepings	Air filter bags and cartridges
Respiratory cartridge filters	Shop abrasives
Stacking boards	
Waste shipping containers (e.g. cartons, bags, drums, cardboard)	
Paper hand towels	Wiping rags and sponges



3747 North Booth Street  
Milwaukee, Wisconsin 53212-1603

Phone: (414) 962-5323  
Fax: (414) 962-7003  
www.esca-tech.com

Contaminated pallets  
Water treatment sludges, filter cakes, residues and solids  
Emission controls dusts, sludges, filter cakes, residues, solids  
Spent grids, posts and separators  
Lead oxide and lead oxide residues  
Spent battery cases, covers and vents  
Water filter media  
Pasting additive bags

Spent batteries  
Lead plates and groups  
Pasting belts  
Cheesecloth from pasting rollers  
Asphalt paving materials

List B: "Exempt Lead Bearing Materials When Generated or Originally Produced by Any Industry":

Charging jumpers and clips  
Platen abrasive  
Fluff from lead wire and cable casings  
Lead based pigments and compounding pigment dust.

This brings us to last two materials that Tulip recycle scrap lead metal and dross, since neither appear on these lists. Both of these materials are by-products that are exempt from hazardous waste regulation when recycled.

These regulations require proof that the material was actually recycled. This proof includes a copy of the bill of lading and either: (a) payment for the material or (b) a letter from the recycling facility that the material has actually been recycled. Tulip has payment for these materials from the recycling facility.

2.b. Definition: By-products consist of materials that are not one of the primary products of the production Process and is not solely or separately produced by the production process. By-products exhibiting hazardous waste characteristics are not waste when they are reclaimed.

Speculative Accumulation: In calendar year 2014, Tulip sold to Gopher Resources in Eagan, MN 157,623 lbs. of lead and 4,740 lbs. of antimony for recycling, which is more than 80% of the recyclable lead generated during the year. Thus far in 2015, only one (1) shipment for recycling has been made.

Recycle Lead			Lbs.		
Date	BoL	Who	Punch	Dross	Contaminated
4/3/14	5433	Gopher	31,640	11,906	686
5/6/14	5468	Gopher	41,335		
9/12/14	5540	Gopher	42,786		
12/15/14	5615	Gopher	40,777		
4/7/15	5679	Gopher	18,136	22,954	1,004

If you have any additional questions regarding the lead program at Tulip, please let me know.

Sincerely,  
Dan Askin





Q 3

01/08/2015

## Generator Activity by Date Range

Customer:

72941

From: 01/01/2014

To: 12/31/2014

Generator:

73254

TULIP CORP.

714 EAST KEEFE AVENUE

MILWAUKEE, WI 53212

WO #: 00-0064GRA Invoice: 12782624 Service Date: 01/02/2014

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1014A - 55G NON-HAZ ENERGY RE		5	\$280.04	\$1,400.20			73254-2	
WO Totals				\$1,400.20				

WO #: 00-0068218 Invoice: 12843198 Service Date: 01/26/2014

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
174 - FUEL SURCHARGE		1	\$15.91	\$15.91				
1014A - 55G NON-HAZ ENERGY RE		4	\$260.00	\$1,040.00			73254-14	
1014A - 55G NON-HAZ ENERGY RE		6	\$260.00	\$1,560.00			73254-2	
WO Totals				\$2,615.91				

WO #: 00-00670XD Invoice: 12845398 Service Date: 02/05/2014

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1478 - ORANGE DEGREASER. 55G		1	\$357.72	\$357.72				
1014A - 55G NON-HAZ ENERGY RE		3	\$279.50	\$838.50			73254-14	
174 - FUEL SURCHARGE		1	\$15.91	\$15.91				
WO Totals				\$1,212.13				

WO #: 00-0066CGA Invoice: 12851518 Service Date: 02/25/2014

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
2778 - 80 GAL AQUEOUS LEASE	208273	1	\$810.00	\$810.00		72	73254-10-22	COLD FORM - 127
WO Totals				\$810.00		72		

WO #: 00-0066CGC Invoice: 12851519 Service Date: 02/25/2014

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1634 - TANK UNIT 35 GAL	154184	1	\$394.01	\$394.01	22	27		MAINTENANCE
1634 - TANK UNIT 35 GAL	56923A	1	\$394.01	\$394.01	22	27		
WO Totals				\$788.02	44	54		

1 IS for cold form  
1 IS for MAINTENANCE

WO #: 00-0066CGB Invoice: 12858684 Service Date: 03/03/2014

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
2778 - 80 GAL AQUEOUS LEASE	56924	1	\$738.18	\$738.18	150	72	73254-6	SPRAY BOOTH/COL
WO Totals				\$738.18	150	72		

WO #: 00-006A67J Invoice: 12884807 Service Date: 03/21/2014

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1014A - 55G NON-HAZ ENERGY RE		1	\$280.00	\$280.00			73254-2	
WO Totals				\$280.00				

WO #: 00-006A6X4 Invoice: 12888382 Service Date: 03/24/2014 Reimbursement: Check

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
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01/08/2015

## Generator Activity by Date Range

Customer: 72941

1086 - OIL/OILY WATER PREQUA

From: 01/01/2014

To: 12/31/201

1 \$275.00

\$275.00

WO Totals

\$275.00

WO #: 00-006C83P

Invoice: 12922876

Service Date : 04/18/2014

Reimbursement: Check

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1110 - FUEL SURCHARGE - VAC		1	\$36.27	\$36.27				
1103 - VAC TRUCK STOP FEE (31		1	\$195.82	\$195.82				
1101 - VAC LIQUID PICKUP		610	\$1.01	\$616.10				
WO Totals				\$848.19				

WO #: 00-006AERX

Invoice: 12924792

Service Date : 04/22/2014

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
WO Totals				\$0.00	0			

WO #: 00-006AERY

Invoice: 12924791

Service Date : 04/22/2014

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
2778 - 80 GAL AQUEOUS LEASE	56924	1	\$738.18	\$738.18	50	72	73254-6	SPRAY BOOTH/COL
WO Totals				\$738.18	50	72		

WO #: 00-006AES0

Invoice: 12924790

Service Date : 04/22/2014

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1634 - TANK UNIT 35 GAL	154184	1	\$394.01	\$394.01	22	27		MAINTENANCE
1634 - TANK UNIT 35 GAL	56923A	1	\$394.01	\$394.01	22	27		
1014A - 55G NON-HAZ ENERGY RE		1	\$280.00	\$280.00			73254-2	
WO Totals				\$1,068.02	44	54		

WO #: 00-006EMJ5

Invoice: 13000770

Service Date : 06/17/2014

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1256 - 55 GAL DRUM OPEN		4	\$63.43	\$253.72				
1478 - ORANGE DEGREASER 55G		1	\$357.72	\$357.72				
2778 - 80 GAL AQUEOUS LEASE	56924	1	\$738.18	\$738.18	70	72	73254-6	SPRAY BOOTH/COL
WO Totals				\$1,349.62	70	72		

WO #: 00-006EMJ6

Invoice: 13000769

Service Date : 06/17/2014

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1634 - TANK UNIT 35 GAL	154184	1	\$394.01	\$394.01	22	27		MAINTENANCE
1634 - TANK UNIT 35 GAL	56923A	1	\$394.01	\$394.01	22	27		
1014A - 55G NON-HAZ ENERGY RE		1	\$280.00	\$280.00			73254-2	
WO Totals				\$1,068.02	44	54		

WO #: 00-006KBB

Invoice: 13031099

Service Date : 07/11/2014

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
174 - FUEL SURCHARGE		1	\$16.32	\$16.32				
1256 - 55 GAL DRUM OPEN		3	\$54.00	\$162.00				
1000A - 55G SUPFUEL UNSPEC		3	\$225.00	\$675.00			73254-15	
WO Totals				\$853.32				

Environmental Protection Agency

Pt. 266, App. XIII

TABLE A-2—CRITICAL VALUES FOR USE IN THE Q-TEST—Continued

n	Q <sub>α</sub>
9	0.44
10	0.41

[56 FR 32892, July 17, 1991 as amended 56 FR 42512, 42516, Aug. 27, 1991; 57 FR 38586, Aug. 25, 1992; 57 FR 44999, Sept. 30, 1992; 62 FR 32463, June 13, 1997]

APPENDIX X TO PART 266 [RESERVED]

APPENDIX XI TO PART 266—LEAD-BEARING MATERIALS THAT MAY BE PROCESSED IN EXEMPT LEAD SMELTERS

A. Exempt Lead-Bearing Materials When Generated or Originally Produced By Lead-Associated Industries<sup>1</sup>

Acid dump/fill solids  
Sump mud  
Materials from laboratory analyses  
Acid filters  
Baghouse bags  
Clothing (e.g., coveralls, aprons, shoes, hats, gloves)  
Sweepings  
Air filter bags and cartridges  
Respiratory cartridge filters  
Shop abrasives  
Stacking boards  
Waste shipping containers (e.g., cartons, bags, drums, cardboard)  
Paper hand towels  
Wiping rags and sponges  
Contaminated pallets  
Water treatment sludges, filter cakes, residues, and solids  
Emission control dusts, sludges, filter cakes, residues, and solids from lead-associated industries (e.g., K069 and D008 wastes)  
Spent grids, posts, and separators  
Spent batteries  
Lead oxide and lead oxide residues  
Lead plates and groups  
Spent battery cases, covers, and vents  
Pasting belts  
Water filter media  
Cheesecloth from pasting rollers  
Pasting additive bags  
Asphalt paving materials

B. Exempt Lead-Bearing Materials When Generated or Originally Produced By Any Industry

Charging jumpers and clips

<sup>1</sup>Lead-associated industries are lead smelters, lead-acid battery manufacturing, and lead chemical manufacturing (e.g., manufacturing of lead oxide or other lead compounds).

Platen abrasive  
Fluff from lead wire and cable casings  
Lead-based pigments and compounding pigment dust

[56 FR 42517, Aug. 27, 1991]

APPENDIX XII TO PART 266—NICKEL OR CHROMIUM-BEARING MATERIALS THAT MAY BE PROCESSED IN EXEMPT NICKEL-CHROMIUM RECOVERY FURNACES

A. Exempt Nickel or Chromium-Bearing Materials when Generated by Manufacturers or Users of Nickel, Chromium, or Iron

Baghouse bags  
Raney nickel catalyst  
Floor sweepings  
Air filters  
Electroplating bath filters  
Wastewater filter media  
Wood pallets  
Disposable clothing (coveralls, aprons, hats, and gloves)  
Laboratory samples and spent chemicals  
Shipping containers and plastic liners from containers or vehicles used to transport nickel or chromium-containing wastes  
Respirator cartridge filters  
Paper hand towels

B. Exempt Nickel or Chromium-Bearing Materials when Generated by Any Industry

Electroplating wastewater treatment sludges (F006)  
Nickel and/or chromium-containing solutions  
Nickel, chromium, and iron catalysts  
Nickel-cadmium and nickel-iron batteries  
Filter cake from wet scrubber system water treatment plants in the specialty steel industry<sup>1</sup>  
Filter cake from nickel-chromium alloy pickling operations<sup>1</sup>

[56 FR 42517, Aug. 27, 1991]

APPENDIX XIII TO PART 266—MERCURY BEARING WASTES THAT MAY BE PROCESSED IN EXEMPT MERCURY RECOVERY UNITS

These are exempt mercury-bearing materials with less than 500 ppm of 40 CFR Part 261, appendix VIII organic constituents when generated by manufacturers or users of mercury or mercury products.

1. Activated carbon
2. Decomposer graphite
3. Wood
4. Paper
5. Protective clothing

<sup>1</sup>If a hazardous waste under an authorized State program.



01/08/2015

## Generator Activity by Date Range

Customer: 72941

From: 01/01/2014

To: 12/31/201

WO #: 00-006KC8C

Invoice: 13033166

Service Date: 07/10/2014

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1256 - 55 GAL DRUM OPEN		4	\$54.00	\$216.00				
1014A - 55G NON-HAZ ENERGY RE		2	\$280.00	\$560.00			73254-14	
1000A - 55G SUPFUEL ONSPEC		5	\$225.00	\$1,125.00			73254-15	
WO Totals				\$1,901.00				

WO #: 00-006JP83

Invoice: 13069246

Service Date: 08/06/2014

Reimbursement: Check

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1110 - FUEL SURCHARGE - VAC		1	\$36.27	\$36.27				
1103 - VAC TRUCK STOP FEE (3 I		1	\$195.82	\$195.82				
1101 - VAC LIQUID PICKUP		648	\$1.01	\$654.48			73254-10-54	
WO Totals				\$886.57				

WO #: 00-006MECR

Invoice: 13069245

Service Date: 08/07/2014

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
2778 - 80 GAL AQUEOUS LEASE	56924	1	\$738.18	\$738.18	60	72	73254-6	SPRAY BOOTH/COI
WO Totals				\$738.18	60	72		

WO #: 00-006KRE3

Invoice: 13076170

Service Date: 08/12/2014

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
952P - PICKUP 55G CAT TAILS		1	\$0.00	\$0.00			73254-2	
WO Totals				\$0.00				

WO #: 00-006MK9W

Invoice: 13076169

Service Date: 08/12/2014

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1634 - TANK UNIT 35 GAL	56923A	1	\$394.01	\$394.01	26	27		
1634 - TANK UNIT 35 GAL	154184	1	\$394.01	\$394.01	26	27		MAINTENANCE
WO Totals				\$788.02	52	54		

WO #: 00-006R25A

Invoice: 13116580

Service Date: 09/11/2014

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1014A - 55G NON-HAZ ENERGY RE		3	\$280.00	\$840.00			73254-14	
1256 - 55 GAL DRUM OPEN		3	\$54.00	\$162.00				
WO Totals				\$1,002.00				

WO #: 00-006PY0C

Invoice: 13151667

Service Date: 10/07/2014

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
2778 - 80 GAL AQUEOUS LEASE	56924	1	\$738.18	\$738.18	70	72	73254-6	SPRAY BOOTH/COI
WO Totals				\$738.18	70	72		

WO #: 00-006PY0D

Invoice: 13151666

Service Date: 10/07/2014

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1634 - TANK UNIT 35 GAL	154184	1	\$394.01	\$394.01	22	27		MAINTENANCE
1634 - TANK UNIT 35 GAL	56923A	1	\$394.01	\$394.01	22	27		
WO Totals				\$788.02	44	54		



01/08/2015

## Generator Activity by Date Range

Customer:

72941

From: 01/01/2014

To: 12/31/2014

WO #: 00-006NX46

Invoice:

13165513

Service Date :

10/17/2014

Reimbursement: Check

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1110 - FUEL SURCHARGE - VAC		1	\$36.27	\$36.27				
1103 - VAC TRUCK STOP FEE (31		1	\$195.82	\$195.82				
1101 - VAC LIQUID PICKUP		709	\$1.01	\$718.09			73254-10-54	
WO Totals				\$948.18				

WO #: 00-006V9EY

Invoice:

13177248

Service Date :

10/24/2014

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1258 - 55 GAL DRUM OPEN		1	\$54.00	\$54.00				
1014A - 55G NON-HAZ ENERGY RE		1	\$280.00	\$280.00			73254-2	
1478 - ORANGE DEGREASER 55G		1	\$357.72	\$357.72				
WO Totals				\$691.72				

WO #: 00-006W5E9

Invoice:

13224684

Service Date :

12/02/2014

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1014A - 55G NON-HAZ ENERGY RE		1	\$331.67	\$331.67			73254-7	
1014A - 55G NON-HAZ ENERGY RE		1	\$331.67	\$331.67			73254-2	
WO Totals				\$663.34				

WO #: 00-006W5ER

Invoice:

13224683

Service Date :

12/02/2014

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
2778 - 80 GAL AQUEOUS LEASE	56924	1	\$811.26	\$811.26	70	72	73254-6	SPRAY BOOTH/COL
WO Totals				\$811.26	70	72		

WO #: 00-006W5ET

Invoice:

13224682

Service Date :

12/02/2014

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1634 - TANK UNIT 35 GAL	154184	1	\$423.56	\$423.56	25	27		MAINTENANCE
1634 - TANK UNIT 35 GAL	56923A	1	\$423.56	\$423.56	25	27		
WO Totals				\$847.12	50	54		
Generator Totals				\$24,848.38	748	828		

## Material Safety Data Sheet

**COATING FOR LEAD BUSHINGS, PPO-100****WEDOR PART No. P-5001****MSDS No. 143**

Date of Preparation: 03/06

Revision:

### Section 1 - Chemical Product and Company Identification

**Product/Chemical Name:** COATING FOR LEAD BUSHINGS, PPO-100**Chemical Formula:** Complex Mixture**CAS Number:** N/A**Other Designations:** N/A**General Use:** Solvent Mixture, Coating

HMIS	
H	2
F	0
R	0
PPE†	
†Sec. 8	

**Manufacturer:** Wedor Corporation., 1907 S. 89<sup>th</sup> Street, West Allis, WI 53227, Phone (414)329-9047, FAX (414)329-9043, Emergency Phone Number 1-800-424-9300.

### ☆☆☆☆ Emergency Overview ☆☆☆☆

### Section 2 - Composition / Information on Ingredients

Ingredient Name	CAS Number	% wt or % vol.
Perchloroethylene (tetrachloroethylene)	127-18-4	93-98%
Oppanol B-50	N/A	2-3%
Wood Rosin	N/A	2-3%

#### Trace Impurities:

Ingredient	OSHA PEL		ACGIH TLV		NIOSH REL		NIOSH
	TWA	STEL	TWA	STEL	TWA	STEL	IDLH
Perchloroethylene	100ppm; Ceiling 200ppm, 5- min maximum peak in any 3 hours.	None Estab.	25 ppm	100 ppm	Minimize workplace exposure con- centrations	None Estab.	150 ppm.
Oppanol B-50	None Estab.	None Estab.	None Estab.	None Estab.	None Estab.	None Estab.	None Estab.
Wood Rosin	None Estab.	None Estab.	None Estab.	None Estab.	None Estab.	None Estab.	None Estab.

#### Toxicity Data:

Oral (rat) LD50: 2629mg/kg, Inhalation (man) LDLO: 2857 mg/kg, Inhalation (human) TCLO: 96ppm/7hrs, Inhalation (man): 280ppm/2hrs, Inhalation (man) TCLO: 600ppm/10min, Inhalation(rat) LCLO: 34200 mg/m3/8hrs.

Irritation: Skin (rabbit): 810 mg/24h-SEVERE, Eye (rabbit): 162mg - mild

### Section 3 - Physical and Chemical Properties

**Physical State:** Liquid**Appearance and Odor:** Amber liquid with a solvent odor.**Odor Threshold:** N/A**Vapor Pressure:** 2.11 at 22 deg C**Vapor Density (Air=1):** Heavier than air.**Formula Weight:** 13.13 lbs/gal.**PH:** Not applicable**Water Solubility:** 0.02% by weight**Other Solubilities:** Other Solvents and Oils**Boiling Point:** 121 deg C (250 deg F) at 760mm Hg**Freezing/Melting Point:** -19 deg C (-2.2 deg F)**Volatife Component (% vVol):** 100**Evaporation Rate (EHTER =1):** 0.09

-MSDS No. 143

COATING FOR LEAD BUSHING PPO-100

revision date

**Section 4 - Fire-Fighting Measures****Flash Point:** Plus 110 deg F**Flash Point Method:** TCC**Burning Rate:** N/A**Autoignition Temperature:** 490 deg C**LEL:** 1.8% v/v**UEL:** 11.5% v/v at 740 mm Hg 160 deg C**Flammability Classification:** Non-Flammable Liquid.

**Extinguishing Media:** Dry chemical, carbon dioxide or foam is recommended. Water spray is recommended to cool or protect exposed containers materials or structures. Water may be ineffective for extinguishments unless used under favorable conditions by experienced fire fighters. Carbon dioxide can displace oxygen. Use caution when applying carbon dioxide in confined spaces.

**Unusual Fire or Explosion Hazards:** Use self contained breathing apparatus. Wear full protective clothing. Use water spray to cool fire-exposed containers and structures.

**Hazardous Combustion Products:** Combustion can yield corrosive fumes of hydrochloric acid, carbon monoxide and small amounts of toxic phosgene.

**Fire-Fighting Instructions:** Emergency responders in the danger area should wear bunker gear and self-contained breathing apparatus for fires beyond the incipient stage. In addition, wear other appropriate protective equipment as condition warrant. Isolate the danger area. Keep unauthorized personnel out. Stop spill/release if it can be done with minimal risk. Water spray may be useful in dispersing vapors. Cool equipment with water, if it can be done with minimal risk. Avoid spreading burning liquid with water used for cooling purposes.

**Fire-Fighting Equipment:** Because fire may produce toxic thermal decomposition products, wear a self-contained breathing apparatus (SCBA) with a full facepiece operated in pressure-demand or positive-pressure mode.

**Section 5 - Stability and Reactivity**

**Stability:** Coatings for lead bushings PPO-100 is stable at room temperature in closed containers under normal storage and handling conditions.

**Polymerization:** Hazardous polymerization will not occur.

**Chemical Incompatibilities:** Avoid reaction with oxidizing agents. Segregate from strong alkalis.

Haloalkenes are highly reactive. Some of the more lightly substituted lower members are highly flammable; many member of the group are peroxidizable and polymerizable.

**Section 6 - Health Hazard Information****Potential Health Effects**

**Primary Entry Routes:** Inhalation, skin contact, eye contact

**Target Organs:** Liver, kidneys, eyes, upper respiratory system, skin, central nervous system (CNS).

**Acute Effects**

**Inhalation:** Acute intoxication by halogenated aliphatic hydrocarbons appears to take place over two stages. Signs of a reversible narcosis are evident in the first stage and in the second stage signs of injury to organs may become evident. A single organ alone is (almost) never involved.

The vapor is highly discomforting to the upper respiratory tract and lungs.

Inhalation hazard is increased at higher temperatures.

Anesthetic and narcotic effects (with dulling of senses and odor fatigue) are a consequence of exposed to chlorinated solvents. Individual response varies widely; odor may not be considered objectionable at levels which quickly induce central nervous system effects.

**Eye:** The liquid may produce eye discomfort and is capable of causing temporary impairment of vision and/or transient eye inflammation; ulceration Eye contact may cause lachrymation (tears) and burning sensation.

The vapor is highly discomforting to the eyes.

The material may be irritating to the eye, with prolonged contact causing inflammation. Repeated or prolonged exposure to irritants may produce conjunctivitis.

**Skin:** The liquid is highly discomforting to the skin if exposure is prolonged and may cause drying of the skin, which may lead to dermatitis.

Toxic effect may result from skin absorption.

Absorption by skin may readily exceed vapor inhalation.

Symptoms for skin absorption are the same as for inhalation.

Bare unprotected skin should not be exposed to this material.

The material may accentuate any pre-existing skin condition.

Revision date :

## COATING FOR LEAD BUSHINGS PPO-100

MSDS #143

The material may produce severe skin irritation after prolonged or repeated exposure, and may produce a contact dermatitis (nonallergic).

**Ingestion:** Considered an unlikely route of entry in commercial/industrial environments.

The liquid is highly discomforting and toxic if swallowed and may be fatal if swallowed in large quantity.

Ingestion may result in nausea, abdominal irritation, pain and vomiting.

**Carcinogenicity:** NTP-Class 2B, Reasonably anticipated to be a carcinogen, sufficient evidence of Carcinogenicity from studies in experimental animals; IRAC- Group 2B, Possibly carcinogenic to humans; OSHA – Not listed; NIOSH – Listed as a carcinogen; ACGIH – Class A3, Animal carcinogen; EPA-Not listed; MAK- Class B, Justifiably suspected of having carcinogenic potential.

**Chronic effects:** Prolonged or continuous skin contact with liquid may cause defatting with drying, cracking, irritation and dermatitis following.

Workers inhaling 232 to 385 ppm for 8 hours/day, 5 days/week for 2 to 6 years have shown abnormal hepatic function, including cirrhosis, with lightheadedness, headache, malaise and dizziness.

### Emergency and First Aid Procedures

**Inhalation:** Move the exposed person to fresh air at once if symptoms persist seek medical care. If breathing has stopped, give artificial respiration. If breathing is difficult, give humidified oxygen administered by qualified personnel. Seek immediate medical attention.

**Eye Contact:** If the chemical contacts the eyes, immediately wash the eyes with large amounts of room temperature water for at least 15 minutes, occasionally lifting the lower and upper lids. Seek medical attention. Contact lenses should not be worn when working with this chemical

**Skin Contact:** If this chemical contacts the skin, promptly wash the contaminated skin with soap and water for at least 15 minutes. If this chemical penetrates the clothing, promptly remove the clothing and wash the skin with soap and water. If irritation or redness develops, seek medical attention. Launder all clothing before reuse.

**Ingestion:** Aspiration hazard, if the chemical is ingested and the person is conscious, do not induce vomiting because this material can enter the lungs and cause severe lung damage and cause burns to the esophagus. If victim is drowsy or unconscious, place on the left side with head down. If possible, do not leave victim unattended. Seek medical attention.

*After first aid, get appropriate in-plant, paramedic, or community medical support.*

**Note to Physicians:** Treat symptomatically.

Do not administer sympathomimetic drugs as they may cause ventricular arrhythmias.

For acute or short-term repeated exposures to Perchloroethylene:

Tetrachloroethylene/Perchloroethylene is well absorbed through the lungs with peak levels more important than duration in determining blood concentration..

Lungs excrete most of the absorbed Tetrachloroethylene in an unchanged state; about 3% is converted by the liver to form trichloroacetic acid and subsequently excreted by the kidney. Exhaled material has a biologic half-life of 65 hours.

### Section 7 - Spill, Leak, and Disposal Procedures

**Important Note (spills):** Evacuate and ventilate the spill area. Wear skin and eye protection and a positive pressure air-supplied respirator during clean-up. High vapor concentrations can rapidly accumulate in an enclosed or poorly ventilated space. Contain the spill. Prevent liquid from entering sewer. Soak up liquid with absorbent and shovel into waste container. Remove container from work area.

**Spill /Leak Procedures:** Absorb the spill on suitable absorbant and collect for disposal.

**Small Spills:** Take up with sand or other non-combustible absorbant material and place into containers for later disposal.

#### Large Spills

**Containment:** Control large spills by diking. Dispose all spilled material in accordance with federal, state, and local regulations.

**Cleanup:** As above indicated under the Important Note spills.

**Regulatory Requirements:** Follow applicable OSHA regulations (29 CFR 1910.120).

**Disposal:** Contact your supplier or a licensed contractor for detailed recommendations. Follow applicable Federal, state, and local regulations.

**Disposal Regulatory Requirements:** Discarded product is a hazardous waste, U210 under RCRA 40 CFR 261.33. Dispose of these materials in a facility permitted for hazardous waste.

**Container Cleaning and Disposal:** Emptied containers retains hazardous product residue. Observe all hazard precautions. Do not distribute, make available, furnish or reuse emptied container except for storage and shipment of original product. Ensure container is completely empty. Puncture or otherwise destroy empty container before disposal.

**Ecological Information:** See EPA Regulations.

#### EPA Regulations:

RCRA Hazardous Waste Number: Perchloroethylene, Listed (40 CFR 261.33) Listed U210 Toxic Waste.

**-MSDS No. 143****COATING FOR LEAD BUSHING PPO-100**

revision date

CERCLA Hazardous Substance (40 CFR 302.4) listed specific per RCRA, Sec. 3001; CWA, Sec. 311 (b)(4); CWA, Sec. 307(a), CAA, Sec. 112, Perchloroethylene  
SARA Toxic Chemical (40 CFR 372.65): Listed Perchloroethylene  
SARA EHS (Extremely Hazardous Substance) (40 CFR 355): Not listed, Threshold Planning Quantity (TPQ)  
TSCA: Listed Perchloroethylene

**Section 8 - Exposure Controls / Personal Protection****Engineering Controls:**

**Ventilation:** Provide general or local exhaust ventilation systems to maintain airborne concentrations below OSHA PELs (Sec. 2). Local exhaust ventilation is preferred because it prevents contaminant dispersion into the work area by controlling it at its source.

**Administrative Controls:**

**Respiratory Protection:** Seek professional advice prior to respirator selection and use. Follow OSHA respirator regulations (29 CFR 1910.134) and, if necessary, wear a MSHA/NIOSH-approved respirator. Select respirator based on its suitability to provide adequate worker protection for given working conditions, level of airborne contamination, and presence of sufficient oxygen. For emergency or non-routine operations (cleaning spills, reactor vessels, or storage tanks), wear an SCBA.

**Warning!** Air-purifying respirators do not protect workers in oxygen-deficient atmospheres. If respirators are used, OSHA requires a written respiratory protection program that includes at least: medical certification, training, fit testing, periodic environmental monitoring, maintenance, inspection, cleaning, and convenient, sanitary storage areas.

**Protective Clothing/Equipment:** Wear chemically protective gloves, boots, aprons, and gauntlets to prevent prolonged or repeated skin contact. Wear protective eyeglasses or chemical safety goggles, per OSHA eye- and face-protection regulations (29 CFR 1910.133). Contact lenses are not eye protective devices. Appropriate eye protection must be worn instead of, or in conjunction with contact lenses.

**Safety Stations:** Make emergency eyewash stations, safety/quick-drench showers, and washing facilities available in work area.

**Contaminated Equipment:** Separate contaminated work clothes from street clothes. Launder before reuse. Remove this material from your shoes and clean personal protective equipment.

**Comments:** Never eat, drink, or smoke in work areas. Practice good personal hygiene after using this material, especially before eating, drinking, smoking, using the toilet, or applying cosmetics.

**Section 9 - Special Precautions and Comments**

**Handling Precautions:** See below

**Storage Requirements:** Store in a cool, dry place. Close container tightly when not in use.

**DOT Transportation Data (49 CFR 172.101):****Shipping Name:**

Tetrachloroethylene Solution

**Shipping Symbols:** PG III**Hazard Class:** 6.1**ID No.:** UN1897**Packing Group:** III**Label:** PG III**Special Provisions (172.102):**

IB3, N36, T4, TP1

**Packaging Authorizations**

a) Exceptions: 153

b) Non-bulk Packaging: 203

c) Bulk Packaging: 241

**Quantity Limitation:**

a) Passenger, Aircraft, or Railcar: 60 L

b) Cargo Aircraft Only: 220 L

**Vessel Stowage Requirements**

a) Vessel Stowage: A

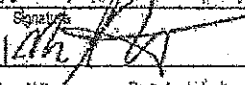
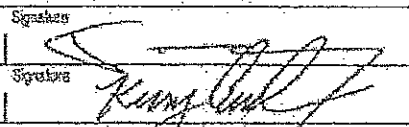
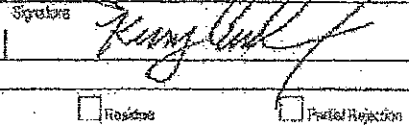
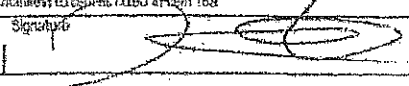
b) Other: 40

**Prepared By:** Wayne T. Benz

**Revision Notes:**

**Disclaimer:** The data contained herein is drawn from recognized sources and believed to be accurate as the date of issue. Persons who have or should obtain professional knowledge intend this information for use and experience in the subjects discussed, and is presented only for your evaluation of the suitability of this product for your use, and for compliance with Federal and State regulations. The manufacturer makes no warranty, express or implied, and disclaims all liability for the accuracy, completeness, and reliability of any information contained herein.



<b>UNIFORM HAZARDOUS WASTE MANIFEST</b> 1. Generator ID Number <b>W10006113013</b>		2. Page 1 of 1 Emergency Response Phone <b>800-424-2300, "1"</b>		4. Manifest Tracking Number <b>002408134 GBF</b>	
5. Generator's Name and Mailing Address <b>TULLIP CORP.</b> <b>714 EAST KEETE AVENUE</b> <b>MILWAUKEE, WI 53212</b> Generator's Phone: <b>(414) 963-3120 X 236</b>					
6. Transporter 1 Company Name <b>HERITAGE-CRYSTAL CLEAN, LLC</b>				U.S. EPAID Number <b>ILR000130062</b>	
7. Transporter 2 Company Name <b>NEFER</b>				U.S. EPAID Number <b>IND984868006</b>	
8. Designated Facility Name and Site Address <b>GIANT RESOURCE RECOVERY-SUMTER</b> <b>755 INDUSTRIAL ROAD</b> <b>SUMTER, SC 29150</b> Facility's Phone: <b>(803) 773-1400</b>				U.S. EPAID Number <b>SCD036275626</b>	
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) <b>100, HAZARDOUS WASTE, LIQUID, N.O.S., 9, PG III, (AQUEOUS PARTS WASTER SOLUTION) (D008) BR# 171</b>	10. Containers No. Type <b>002 DF</b> <b>DM</b>	11. Total Quantity <b>0070</b>	12. U.S. Wt/Vol. <b>6</b>
	X				
	2				
	3				
	4				
14. Special Handling Instructions and Additional Information <b>BY SIGNING BELOW GENERATOR CERTIFIES THAT ITS WASTE STREAM(S) CHARACTERISTICS HAVE NOT CHANGED FROM THE MOST RECENTLY SUBMITTED WASTE PROFILE.</b> <b>1) CE: 73254-6 ISO: 75665 ISO 1003</b>					
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/packaged, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.					
Generator's/Exporter's Printed/Typed Name <b>MARK J. WELTAKEN</b>					
Signature 					
Month Day Year <b>06/17/14</b>					
INTL	16. International Shipments: <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.				
	Transporter signature (for exports only):				
	Port of entry/exit: Date leaving U.S.:				
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials				
	Transporter 1 Printed/Typed Name <b>Keith Godfrey</b>		Signature 		Month Day Year <b>06/17/14</b>
	Transporter 2 Printed/Typed Name <b>KERRY ANDERSON</b>		Signature 		Month Day Year <b>06/21/14</b>
DESIGNATED FACILITY	18. Discrepancy 18a. Discrepancy Indicator: Spec <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection				
	18b. Alternate Facility (or Generator)				
	Facility's Phone:				
	18c. Signature of Alternate Facility (or Generator):				
	Month Day Year				
19. Hazardous Waste Reporting Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)					
1. <b>H141</b>					
20. Designated Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 18a					
Printed/Typed Name <b>Donna R. Baker</b>					Signature 
Month Day Year <b>07/19/14</b>					





# Spartan Chemical Company, Inc.

## Material Safety Data Sheet

### SECTION I: PRODUCT INFORMATION

Product Name or Number (as it appears on label):  
**ORANGE TOUGH 40**  
Product Number: 2240

Product Division:  
**Janitorial**

Spartan Chemical Company, Inc.  
1110 Spartan Drive  
Maumee OH 43537

Product/Technical Information: 1-(800)-537-8990  
Medical Emergency: 1-(888)-314-6171 (24 hours)  
Chemical Leak/Spill Emergency: CHEMTREC 1-(800) 424-9300 (24 hours)

Shipping Description: Non Hazardous Products

NFPA Ratings:	HMIS Ratings:
Health: 2 - Moderate Fire: 2 - Moderate Reactivity: 0 - Minimal	Health: 2 - Moderate Fire: 2 - Moderate Reactivity: 0 - Minimal Pers. Prot. Equip.: See Section VIII

### SECTION II: HAZARDOUS INGREDIENTS

(Listed when present at 1% or greater, carcinogens at 0.1% or greater) All component chemicals are listed or exempted from listing on the "TSCA Inventory" of chemical substances maintained by the U.S. Environmental Protection Agency.

Chemical Name(s)	%Wt	CAS Registry No.	Table Z-1-A			NTP, IARC or OSHA Carcinogen
			TWA mg/m <sup>3</sup>	STEL mg/m <sup>3</sup>	CEILING mg/m <sup>3</sup>	
d-limonene	35-40	5989-27-5	Not Established	Not Established	Not Established	No
Nonyl phenol ethoxylate	10-15	127087-87-0	Not Established	Not Established	Not Established	No
Triethanolamine	05-10	27323-41-7	Not Established	Not Established	Not Established	No
dodecylbenzenesulfonate	-	-	-	-	-	-
Triethanolamine	05-10	102-71-6	5 (ACGIH)	Not Established	Not Established	No
Hexylene glycol	01-05	107-41-5	Not Established	Not Established	121 (NIOSH)	No
Dicarboxylic fatty acid, dipotassium salt	01-05	66375-37-9	Not Established	Not Established	Not Established	No
Tetrasodium ethylene diaminetetraacetate	01-05	64-02-8	Not Established	Not Established	Not Established	No
	-	-	-	-	-	-

### SECTION III: PHYSICAL DATA

Boiling Point: >212 °F	Vapor Pressure: Unknown
Vapor Density (AIR = 1): Unknown	Solubility in Water: Emulsifiable
pH: 9.0	Specific Gravity (H <sub>2</sub> O=1): 0.96
Evaporation Rate (but.acet.=1): <1	Percent Solid by Weight: 20-25
Physical State: Liquid	
Appearance & Odor: Clear, orange liquid. Orange citrus fragrance.	

**SECTION IV: FIRE & EXPLOSIVE HAZARD DATA**

Flash Point: 124°F	Method Used: ASTM-D56
Flammable Limits: Unknown	Flame Extension: N/A
Extinguishing Media: Foam, dry chemical, carbon dioxide, water fog or spray	
Special Fire Fighting Procedures: Wear NIOSH approved self-contained breathing apparatus and protective clothing. Cool fire-exposed containers with water spray.	
Unusual Fire & Explosive Hazards: Combustible liquid and vapor. Keep away from heat, sparks or flame. Combustion products are toxic.	

**SECTION V: HEALTH HAZARD DATA**

Threshold Limit Value: Not Established	Primary Routes of Entry: Inhalation, Skin Contact, Eyes and Oral
Effects of Overexposure- Conditions to Avoid:	<b>Causes eye irritation:</b> Symptoms may include pain, redness and swelling of the conjunctiva. <b>Causes skin irritation:</b> Symptoms may include redness, pain and swelling. <b>Harmful if swallowed:</b> Symptoms may include pain, nausea, vomiting and diarrhea. <b>Breathing product vapors or mist may cause respiratory irritation:</b> Symptoms may include nasal discomfort and coughing. Contains d-limonene, hexylene glycol and triethanolamine which may cause skin sensitization with repeated contact. Repeated overexposure to triethanolamine may cause liver and kidney damage. <b>Avoid contact with eyes, skin and clothing. Avoid breathing product vapors or mists. Do not swallow. Use with adequate ventilation. Wash thoroughly after handling.</b>
Conditions Aggravated by Use:	Use of this product may aggravate preexisting skin; eye and respiratory disorders including asthma and dermatitis.
<b>Emergency &amp; First Aid Procedures:</b>	
Eyes:	Flush eyes with water for at least 15 minutes. Remove contact lenses. Get medical attention.
Skin:	Remove contaminated clothing. Flush skin with water for at least 15 minutes. Get medical attention if irritation persists. Wash contaminated clothing before reuse.
Ingestion:	Do not induce vomiting. Drink one or two glasses of water to dilute product. Get medical attention. Do not give anything by mouth to an unconscious person.
Inhalation:	Move person to fresh air. Get medical attention if irritation persists.

**SECTION VI: REACTIVITY DATA**

Stability: Stable	Incompatible Materials: Strong oxidants
Hazardous Decomposition Products: CO, CO <sub>2</sub>	Hazardous Polymerization: Will Not Occur

**SECTION VII: SPILL OR LEAK PROCEDURES**

Steps to be Taken in Case Material is Released or Spilled:	Dike and contain spill with inert material (sand, earth, commercial absorbent, etc.) and transfer to containers for disposal. Keep spill out of storm sewers and waterways.
Waste Disposal Method:	Dispose of in compliance with all federal, state and local laws and regulations.

**SECTION VIII: SPECIAL PROTECTION INFORMATION**

Respiratory Protection:	Not normally required when good general ventilation is provided. However if exposure limits are exceeded (see Section II) or if respiratory irritation occurs, the use of a NIOSH approved respirator suitable for the use-conditions and chemicals listed in Section II should be considered.
Ventilation:	Provide good general ventilation. Local exhaust ventilation may be necessary for some operations.
Protective Gloves(Specify Type):	Rubber or other impervious gloves.
Eye Protection(Specify Type):	Splash goggles are recommended to prevent eye contact.
Other Protective Equipment:	See 29 CFR 1910.132-138 for further guidance.

**SECTION IX: SPECIAL PRECAUTIONS**

Precautions; Handling & Storing:	Combustible liquid and vapors. Flash Point 124°F. Keep away from heat, sparks, or open flame. Keep container tightly closed. Store in a cool, dry area. Do not store above 120°F.
Other Precautions:	Keep out of reach of children.



Ref: 29 CFR 1910.1200 (OSHA)      Changes:      General review

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Please print or type. (Form designed to be used on a 12-pitch typewriter.)

Form Approved. OMB No. 2050-0033

84  
3-56

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number <b>WID006113013</b>	7. Page 1 of 1	3. Emergency Response Phone <b>800-626-8337</b>	4. Manifest Tracking Number <b>002288039 GBF</b>
5. Generator's Name and Mailing Address <b>Tulip Corp 714 East Keefe Ave Milwaukee, WI 53212</b>					
Generator's Phone: <b>(414) 963-3128</b>					
6. Transporter 1 Company Name <b>NEIER</b>					
7. Transporter 2 Company Name <b>NEIER</b>					
8. Designated Facility Name and Site Address <b>EE PRO-CHEM BRIDGEVIEW PLANT 421 LUCAS ST DUNELLS, MI 48015</b>					
Facility's Phone: <b>313-220-0612</b>					
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type	11. Total Quantity	12. Unit: W/Ast
	X	RQ, UN1993, Waste Flammable Liquids, No. 3, 3, PGII, (Isopara Finic Hyd rocarbonyl) (DOO) E13 128	003 DM	0150	G
14. Special Handling Instructions and Additional Information <b>HCC 73254-15 Used oil contaminated HCC FBLRQ -1000</b>					
15. GENERATOR'S OFFICER'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the consignment of this consignment conforms to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste material is not a manifest identified in 40 CFR 260.27(a) (1) I am a large quantity generator or (2) (a) am a small quantity generator's true					
Generator's Officer (Printed Name) <b>Joseph MacLennan</b>		Signature <i>Joseph MacLennan</i>		Month Day Year <b>10 7 11 14</b>	
16. Importation/Exportation	<input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit: Date leaving U.S.		
17. Transporter Acknowledgment of Receipt of Materials					
TRANSPORTER	Transporter 1 Printed/Typed Name <b>Brendan J. Williams</b>		Signature <i>Brendan J. Williams</i>		Month Day Year <b>10 7 11 14</b>
	Transporter 2 Printed/Typed Name <b>Wright Billingsley</b>		Signature <i>Wright Billingsley</i>		Month Day Year <b>10 7 11 14</b>
DESIGNATED FACILITY	18. Discrepancy				
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Racks <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection				
	18b. Alternate Facility (or Generator) Manifest Reference Number U.S. EPA ID Number				
	Facility's Phone:				
	18c. Signature of Alternate Facility (or Generator) Month Day Year				
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, storage, and recycling systems)					
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 18a					
Printed/Typed Name <b>Tim Culligan</b>		Signature <i>Tim Culligan</i>		Month Day Year <b>10 7 11 14</b>	

EPA Form 6700-22 (Rev. 3-05) Previous editions are obsolete

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter)

Form Approved, OMB No. 2050-0038

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>WID006113013</b>	2. Page 1 of 2	3. Emergency Response Phone <b>800-424-9300</b>	4. Manifest Tracking Number <b>0018048361GBF</b>
5. Generator's Name and Mailing Address <b>Tulip Corp.</b> <b>714 East Keefe Avenue</b> <b>Milwaukee WI 53212</b> Generator's Phone: <b>414-963-3120</b>					
6. Transporter 1 Company Name <b>Robble D Wood INC</b>					
7. Transporter 2 Company Name <b>Robble D Wood INC</b>					
8. Designated Facility Name and Site Address <b>Robble D Wood INC</b>					
9. Facility's Phone: <b>414-963-3120</b>					
10. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10a. Quantity	10b. Unit	10c. Waste Codes		
	10d. No.	10e. Type	10f. Total Quantity	10g. Unit	10h. Waste Codes
	X	1. RG, UN1993, Waste Flammable Liquids, N.D.S. 3	005 DM	0275	6
		PG III (Isoparaffinic Hydrocarbons) (Dool)			
		Erg # 128			
14. Special Handling Instructions and Additional Information <b>1) CC: 73254-15 FBLIR -1000</b>					
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/retarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.					
Generator's/Offeror's Printed/Typed Name <b>Joey F Muhammad</b>					
Signature <i>Joey F Muhammad</i>					
Month Day Year <b>10 7 11</b>					
16. International Shipments: <input type="checkbox"/> Export to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____					
17. Transporter Acknowledgment of Receipt of Manifest:					
Transporter 1 Printed/Typed Name <b>Brandon Carmichael</b>					
Signature <i>Brandon Carmichael</i>					
Month Day Year <b>10 7 11</b>					
Transporter 2 Printed/Typed Name <b>R Charles</b>					
Signature <i>R Charles</i>					
Month Day Year <b>11 7 11</b>					
18. Discrepancy					
18a. Discrepancy Indication Space: <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Portion <input type="checkbox"/> Full Portion					
Manifest Reference Number: _____ U.S. EPA ID Number: _____					
18b. Alternate Facility (for Generator): _____					
Facility's Phone: _____					
18c. Signature of Alternate Facility (for Generator): _____ Month Day Year _____					
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)					
1. <b>Hell</b> 2. _____ 3. _____ 4. _____					
20. Designated Facility Owner or Operator Certification of receipt of hazardous materials covered by the manifest except as noted in item 18b					
Printed/Typed Name <b>Amanda Yampka</b>					
Signature <i>Amanda Yampka</i>					
Month Day Year <b>11 12 11</b>					

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

KQ, NA3082, Hazardous Waste, Liquid, N.O.S., 9, PG 111, (Aqueous Parts Washer Solution) (Dwg 2) EL6 #171



High Lead

### SUMMARY CERTIFICATE OF ANALYSIS

HERITAGE ENVIRONMENTAL SERVICES, LLC Report To CATHERINE MCCORD HERITAGE- CRYSTAL CLEAN, LLC 2175 POINT BLVD. SUITE 375 - EHS DEPT. ELGIN, IL 60123-9211	Sampled 20-DEC-11 15:00	Lab ID A938212
	Received 27-DEC-11	Client ID : TULIP CORP Matrix : SLUDGE, SOIL, SOLID OR SEDIMENT
	Completed 29-DEC-11	Submitter: 9018 - HERITAGE- CRYSTAL CLEAN Data Package # : N/A

Sample Description  
DESCRIPTION: AQUEOUS PARTS CLEANING FLUID  
CC NUMBER: CC102122011C PARTS WASHER A  
SALES REP: KELLY

Metals Analysis						
Method	Rep	Parameter	Analyzed	Result	Det. Limit	Units
SW6010B	0	LEAD, TOTAL	29-Dec-11	330	0.20	mg/kg

Sample Comments  
ANALYSES PERFORMED CONFORM TO THE WASTE ANALYSIS QUALITY ASSURANCE PLAN.  
Sample was not received on ice at temperature 22 C.  
Sample chain of custody number HCC.  
This is a summary report. Complete analytical information can be found in the full Certificate of Analysis, available upon request.

*Gary A. Klingler*

Approved by: GARY KLINGLER 29-DEC-11



KQ, UN1993, Waste Flammable Liquids, N.O.S., 3, P6III, (Isoparaffinic Hydrocarbons) (D001) ER6 #128

Because of High Phosphorus and Lower Flash



# HERITAGE-CRYSTAL CLEAN LABORATORY

## CERTIFICATE OF ANALYSIS

NAME Anita Pendry	REPORT TO	SAMPLE DATE 03/24/14	LAB ID: 033120141188	
	ADDRESS: Heritage-Crystal Clean, LLC 3175 Point Blvd Suite 375 EHS Dept Elgin IL 60123-9211	RECEIPT DATE 03/31/14		CLIENT ID: Tulip Corp
		COMPLETED DATE 03/31/14		

SAMPLE DESCRIPTION/MATRIX: Used Oil	SAMPLE DESCRIPTION
CC NUMBER: Tulip Corp	
SALES REP: Gonzales	
BRANCH: Milwaukee	

ORGANICS/INORGANIC							
METHOD	REP	PARAMETER	ANALYSIS DATE	RESULT	DET LIMIT	UNITS	ANL
EPA 8082	0	PCB AROCLOR 1016	03/31/14	BDL	1.0	mg/kg	AL
EPA 8082	0	PCP AROCLOR 1221	03/31/14	BDL	2.0	mg/kg	AL
EPA 8082	0	PCB AROCLOR 1232	03/31/14	BDL	1.0	mg/kg	AL
EPA 8082	0	PCB AROCLOR 1242	03/31/14	BDL	1.0	mg/kg	AL
EPA 8082	0	PCB AROCLOR 1248	03/31/14	BDL	1.0	mg/kg	AL
EPA 8082	0	PCB AROCLOR 1254	03/31/14	BDL	1.0	mg/kg	AL
EPA 8082	0	PCB AROCLOR 1260	03/31/14	BDL	1.0	mg/kg	AL
EPA 8082	0	PCB AROCLOR 1262	03/31/14	BDL	1.0	mg/kg	AL
EPA 9075	0	CHLORINE	03/31/14	BDL	1000	ppm	ER
ASTM D5185 MOD	0	SILICON	03/31/14	12	0.5	ppm	ER
ASTM D5185 MOD	0	PHOSPHORUS	03/31/14	3403	0.5	ppm	ER

METHOD	REP	PARAMETER	ANALYSIS DATE	RESULT	DET LIMIT	UNITS	ANL
	0	COLOR	03/31/14	*			AL
	0	PHYSICAL APPEARANCE	03/31/14	*			AL
ASTM D1788	0	Organic Phase	03/31/14	89		Percent	AL
ASTM D1796	0	Solids	03/31/14	1		Percent	AL
ASTM D93 / D7094	0	FLASH POINT ANALYSIS	03/31/14	138	70	Degrees F	AL
SW9040C / 9045C	0	pH, LAB	03/31/14	7.0	6-14	Std Units	AL

NOTE: \* BROWN 1 PHASE LIQUID

SAMPLE COMMENTS	
ANALYSES PERFORMED CONFORM TO THE WASTE ANALYSIS QUALITY ASSURANCE PLAN	
* See Note for Parameter	
* Greater Than	
BDL Below Detection Limit	
This report is for the classification of material under the guidance and support of H.C.C. Collection Procedures C-1	

APPROVED BY: \_\_\_\_\_ DATE: \_\_\_\_\_

# HERITAGE - CRYSTAL CLEAN - BILL OF LADING

HCC Use	Loc: MILWAUKEE	Route: 4	Page 1 of 1
Doc #	605MSL	PR:130808	WO # 605MSL

Shipper's Name And Mailing Address		Physical Address		Generator EPA ID	
TULIP CORP. 714 East Keefe Ave MILWAUKEE, WI 53212					
Generator Phone:				Generator State ID	
Transporter 1 Company Name		Transp 1 EPA Id	Transp 1 State Id	Transp 1 Phone	
HERITAGE-CRYSTAL CLEAN, LLC		ILLR000130062		(847)836-5670	
Transporter 2 Company Name		Transp 2 EPA Id	Transp 2 State Id	Transp 2 Phone	
NEIER		IND984868406		(317)566-2277	
Transporter 3 Company Name		Transp 3 EPA Id	Transp 3 State Id	Transp 3 Phone	
Receiving Facility		Facility EPA Id	Facility State Id	Facility Phone	
HERITAGE-CRYSTAL CLEAN, LLC. 1560 WEST RAYMOND ST INDIANAPOLIS, IN 46221		ILLR000130062		(800)424-9300	
		24hr Emergency Phone		(800)424-9300	

HM Waste Shipping Description and DOT Description (as applicable)		Container No.	Total Qty	Unit
A	NON-DOT / RCRA Regulated, (Absorbent and oil)	001	DM	0055 G
B				
C				
D				

## Special Handling Instructions, Additional Information and Handling Codes (as Applicable)

73254-2 1014A
---------------

**SHIPPERS CERTIFICATION:** I certify that the material(s) described above on this bill of lading are fully and accurately described and are not subject to full regulation under the Resource Conservation and Recovery Act except 261.5 as related to CESQGs.

SHIRAZ J. WHITTAKER Printed/Typed Name Transporter 1 Acknowledgement of Receipt Materials	 Signature Date 06-17-14
Keith Godfrey Printed/Typed Name Transporter 2 Acknowledgement of Receipt Materials	 Signature Date 06-17-14
KERRY ANDERSON Printed/Typed Name Transporter 3 Acknowledgement of Receipt Materials	 Signature Date 6-21-14

Printed/Typed Name \_\_\_\_\_ Signature \_\_\_\_\_ Date \_\_\_\_\_

## Additional Description / Discrepancies

--

Facility Owner or Operator: \_\_\_\_\_ Certification of receipt of waste materials covered by this bill of lading.

 Printed/Typed Name Signature Date 7/8/14
--

ORIGINAL - RETURN TO GENERATOR



# TULIP MOLDED PLASTICS CORPORATION

## Environmental Education:

### HANDLING/DISPOSAL-WASTE AND RECYCLABLE ITEMS

This training is to make you aware of guidelines for handling, storage, labeling and disposal of environmentally sensitive and recyclable materials.

#### General Trash

Receptacles labeled "**General Trash**" are located through out the plant and office.

**This CANNOT include anything that is contaminated or mixed with lead.**

Acceptable trash includes:

- Plastic banding from cardboard bundles and plastic bottles
- Aluminum cans and other recyclable aluminum
- Empty propane canisters
- All exhaust filters from the coating spray booth and any other waste material that may be contaminated with hardened coating material is considered non-hazardous.
- Floor sweepings including clean plastic and **NO Lead**
- Polypropylene soaked with oil after oil has been drained off

To discard trash, take it to the *north end of the warehouse, open the overhead door labeled "Garbage Only No Recyclables", and dump the trash into the dumpster.*

#### Plastics

All Polypropylene material from presses is to be placed in "**Scrap for Grinding**" bins throughout the molding department to be recycled in the Grinding Room.

Filled Gaylords are to be taken to *the designated area.*

#### Metal

There are 55 gallon black metal drums located throughout the plant for the disposal of the metal. This includes:

- Banding could be cut with metals cutters into smaller strips or bent to fit into the drum.
- Scrap steel, metal chips, scrap metal, burnt motors, etc.

When the drum is filled it should be dumped into the  *dumpster inside the northeast end of the warehouse.*

### **Cardboard**

- Recyclable Tulip lead cartons are to be put  *in large roll around red bins and returned to Cold Form*
- Clean scrap cardboard should be placed  *in large gray roll around plastic bins* marked **"Scrap Cardboard Only"** located throughout the plant.
- Lead terminal boxes from outside vendors (Gauthier, Water Gremlin, Centrifugal, etc.) should be disposed of as non hazardous waste  *in large gray roll around plastic bins* marked **"Scrap Cardboard Only"** located throughout the plant.

When the large roll around gray plastic bins are full, they need to be dumped into  *the compactor located in the north end of the warehouse.*

### **Cardboard Contaminated with Lead**

10" x 10" x 3" Cardboard boxes that are used by the Cold Form Department to hold product sold to the Plastics Department must be disposed of as hazardous waste when box is too damaged to use.

These boxes along with any miscellaneous cardboard that is contaminated with lead must be put  *into a Gaylord located in Cold Form* labeled **"Contaminated Cardboard"**.

This Gaylord must be labeled with a **"Hazardous Waste"** label and the label must be filled out completely before the Gaylord leaves the building. Label is Brady part number 60448.

### **Recyclable Paper Products**

This includes computer paper, shredded paper, office papers and corrugated containers. All plant and corporate personnel are responsible for placing their recyclables in the containers provided.

These items are separated and stored in roll around bins located outside the mailroom. When the bins are full, they need to be dumped into  *the compactor located in the north end of the warehouse.*

### **Universal Waste**

All universal waste must be labeled  *with the category of universal waste and the starting date of accumulation.* All universal waste must be disposed of  *within one year* of the start of accumulation

### **Lighting**

Maintenance personnel will place removed lamps as follows:

- Florescent lamps are to be put in  *circular florescent lamp tubes located in the old boiler room located in the southeast corner of the building.*
- Incandescent lamps, high intensity discharge lamps such as high-pressure sodium vapor, metal halide and mercury vapor in a container labeled **"Used Lights and Bulbs"**,  *located in the old boiler room located in the southeast corner of the building.*

- Bulb Ballast will be processed following the same procedure as **"Used Lights and Bulbs"**, *located in the old boiler room located in the southeast corner of the building.*

#### **Used Electronics**

All used electronics such as computers, monitors, printers, laptops, etc. are accumulated in accounting. As needed, *Maintenance will arrange for disposal.*

#### **Batteries (Dry Cell)**

Maintenance personnel will place batteries in containers holding batteries labeled as **"Dry Cell Battery Recycling"** *located on a cart between the maintenance supervisor's office and the production supervisors office. Maintenance will arrange for disposal.*

#### **Batteries (Lead Acid)**

Maintenance personnel will place batteries on the bottom of a cart labeled **"Lead Acid Battery Storage"** *located between the maintenance supervisor's office and the production supervisors office. Maintenance will arrange for disposal.*

#### **Mercury Containing Equipment**

Maintenance personnel will place batteries in containers holding Mercury Containing Equipment labeled as **"Mercury Device Recycling"** *located on a cart between the maintenance supervisor's office and the production supervisors office. Maintenance will arrange for disposal.*

#### **Lead**

Scrap lead terminals without plastic, lead debris from boxes, lead debris that is shaken off or that falls from the vibrator bowl feeders, robots or molds, are is to be *put into red tote boxes and taken to Cold Form for recycling.*

#### **Lead Dross Recycling**

Dross removed from the melting furnace or casting machine must be placed in 55 gallon or 30 gallon steel drums.

Lead contaminated with hydraulic oil should be placed in the Lead Dross 55 gallon or 30 gallon steel drums.

- Drums are to be 1A2 bolt ring top drums.
- Dross drums must be free of lead on the outside of the drum before they leave the facility.
- Every drum must be identified with two labels; A **"Material for Recycle"** label that identifies **"LEAD DROSS"** and a **"DOT"** identification label. Information must be legible.



- Lead dross drums must be removed from the Cold Form Department as soon as they are filled and sealed. **Three (3) drums of accumulating lead dross may be kept in the Cold Form Department at any one time.** Two (2) drums are located at the furnace and one (1) drum is located at the caster.

Lead dross awaiting shipment and empty drums used for lead dross are only be stored *in the drum storage area located to the east of the Cold Form Department.*

### **Water Recycling**

Water used to clean floors or machines will be evaporated using a water evaporation unit labeled "**Mop and Scrub Water**", *located in the old boiler room located in the southeast corner of the building.*

- Water for evaporation will be accumulated in 55 gallon drums and transported, when full to the evaporation unit
- Drums are to be 1A2 bolt ring top drums.
- Every drum must be identified with two labels; a "**Hazardous Material**" label that identifies "**WASTE WATER**" and a "**DOT**" identification label. Information must be legible.
- Every drum must be identified with the start date of accumulation.

**Only authorized personnel are allowed to operate the drum evaporation unit.**

The remaining residue will be added to the drum containing lead dross recycling *in the drum storage area located to the east of the Cold Form Department.*

### **Lead Contaminated Waste Recycling**

Contaminated Waste consists of any garbage that **is mixed or contaminated with lead.** This to include but not limited to:

- Oil dry from floor mixed with lead
- Dirt from floor mixed with lead.
- Floor sweepings with plastic and lead mixed.
- Vacuumed lead
- Used knit gloves worn by Cold Form and Plastics employees.
- Used filters from baghouse.
- Used filter bags from baghouse.
- Any scrap or garbage that is 50% or more lead

Every Contaminated Waste drum must be identified with two labels; a "**Material for Recycle**" that identifies "**Contaminated Waste**" and a "**DOT**" identification label.

*Maintenance management will arrange for pick-up and disposal of all waste and recyclable items.*

### **Used Oil**

Used oil collected from plant machines that is not contaminated with foreign substances is to be recycled internally.

Any containers of to accumulate used oil must be labeled "USED OIL".

This waste oil can be dumped into the recycling tank or put into the Maintenance waste oil pickup cart, *both are located in the old boiler room in the southeast corner of the building.*

### **Contaminated Oil**

Oil that is contaminated with foreign substances such as plastic pellets or dirt must be disposed of in the waste oil container *next to the aisle east of the Cold Form Department.* This container is labeled as "USED OIL".

### **Industrial Absorbents**

- This includes such items as oil socks, booms, barrel pads and mats.

Spent absorbents are first placed in a tray and later stored in a 55-gallon drum with a sealable cover *in the old boiler room, located in the southeast corner of the building.* The drum is labeled on the lid "Used Absorbent Materials Only".

### **Water Contaminated with Oil**

This includes any water mixed with machine, industrial or cutting oils.

- The contaminated water is stored in a sealed 450-gallon steel tank located in the boiler room labeled "Water and Hydraulic Oil". Only designated personnel will transfer contaminated water to this tank.

*When the tank is full, maintenance management will have the tank emptied.*

### **Waste from Spray Booth Wash Tank**

- Spray booth wash tank liquid is considered hazardous material and *maintenance will make arrangements with certified waste haulers to drain or clean the wash tank.*

### **Aerosol Cans**

- Empty aerosol cans should be disposed of in the Steel Recycle drums located in the Tool Room, Cold Form and Plastics. When full, the drums should be brought to the blue "Crystal Clean" drum by maintenance, where the cans can be emptied and punctured. The drums must be labeled with the start date of accumulation.
- After the cans have been emptied and punctured, they can be brought to the *dumpster inside the north end of the warehouse.*

### **Spent Sulfuric Acid**

Spent Sulfuric Acid is kept in a storage location in proximity of the Quality Control Lab where the waste is generated in 55 gallon plastic container with a lid. The container must be labeled as "SPENT SULFURIC ACID" along with the *starting date of accumulation.*

If you are not sure of where to dispose of waste or recyclable materials, ask your Supervisor.

## George Koleas

---

**From:** Rasmussen, Brandon <Brandon.Rasmussen@Crystal-Clean.com>  
**Sent:** Tuesday, April 14, 2015 12:03 PM  
**To:** George Koleas  
**Subject:** FW:  
**Attachments:** image2015-04-14-113151.pdf

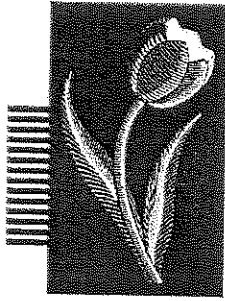
Here are the analytical for the 2 waste streams 732574-6 and -15

Brandon Rasmussen  
Branch Manager  
Crystal Clean  
1005 Richards Rd, unit O  
Hartland, WI 53029  
262-613-3663 Cell  
262-367-2149 Office  
877-938-7948 Toll Free  
262-367-2162 Fax  
[brandon.rasmussen@crystal-clean.com](mailto:brandon.rasmussen@crystal-clean.com)  
[www.Crystal-Clean.com](http://www.Crystal-Clean.com)

**From:** CCMIL\_LEX654@crystalclean.scan [mailto:CCMIL\_LEX654@crystalclean.scan]  
**Sent:** Tuesday, April 14, 2015 10:32 AM  
**To:** Rasmussen, Brandon  
**Subject:**

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# TULIP CORPORATION

## Safety Education: Emergency Action Plan

### SPILL CLEAN UP PROCEDURES

The purpose of this procedure is to prepare all applicable plant personnel for actions to be taken in the event of any spill. The response will be lead by the Cold Form Manager, supported by the Maintenance Supervisor.

Refer to the Spill Prevention, Control and Countermeasures Plan (SPCC)

In the event of a spill, the employee first observing physical evidence of the spill would implement spill response procedures. The facility's spill response procedures are described below.

#### First Actions:

1. Upon noticing a spill, the employee first observing the spill estimates the hazard potential by determining at least the following factors:
  - a. The substance spilled and its hazard potential
  - b. The amount of the spill and the extent of spread
  - c. The source of the leak or spill
2. The first observer of the spill notifies the Maintenance Supervisor or Plant Manager. If the situation is life-threatening or warrants immediate attention, the first observer calls 911.
3. The area is secured, sewers are blocked off to prevent entry of oil, entrances to the spill site are blocked, and people are prevented from entering the contaminated area.
4. If the oil spill has reached a sewer or waterway or adjoining shoreline, the Maintenance Supervisor or Plant Manager must contact the Milwaukee Metropolitan Sewerage District (MMSD), Wisconsin DNR and the National Response Center. All regulatory reporting is the ultimate responsibility of the Plant Manager.
5. The following is to be noted:
  - a. Time and date of the discharge
  - b. Type of material discharged
  - c. Estimates of total quantity discharged





- d. Source and cause of discharge
- e. Description of all effected media
- f. Any known damages or injuries
- g. Actions being taken to stop, remove, and mitigate the effects of the discharge
- h. Names of individuals and/or other organizations that been contacted

#### Spill Containment and Source Elimination

1. The spill responder(s) first attempt to contain the spill only if there is no threat to their safety, so as to prevent its entry into a storm sewer, a ditch, or any conveyance that eventually discharges to a waterway. The equipment that can be used by a Tulip Molded Plastics Corporation employee to contain spills can be found in the facility spill kits. The spill kit may contain absorbent material, disposal bags, and personal protective equipment. Typically, a kit is capable of cleaning up to a 5-gallon or 25- gallon size spill of oil or other liquids. The spill kit(s) are typically located near the petroleum containing equipment or containers. If a larger quantity of oil is present, the used oil cart will be used to vacuum oil. If the oil cart is full, it will be emptied into oil recycling and brought back to pick up the remaining oil until the oil is picked up. Pads and rags will be used to pick up remaining oil and disposed of in drums
2. At the same time as containment is performed or as soon as possible after containment, the spill responder(s) should attempt to seal or otherwise stop the source of the spill. Common methods of eliminating a spill source include closing valves, applying a leak stopping compound for pinhole leaks, using drum over- packs, deactivating pumps, and diverting flow to another pathway with a goal of not allowing the spill to enter a sewer, waterway or adjoining shorelines.
3. Discharge to sewers is prevented by covering or creating a dike around manholes and catch basins.

#### Spill Cleanup and Mitigation for Common Size Spills

1. Shut off all vehicles and equipment in close proximity of the spill.
2. Use the spill kit to prevent the spill's entry into a storm sewer/catch basin, drains, or any conveyance that eventually discharges to a waterway.
3. Use absorbent on the spill without contacting the spill or stepping into the spill.
4. Work uphill into the spill to contain it to a small area and prevent any runoff.
5. Use a non-sparking broom and shovel to spread absorbent on the spill and work it around until the ground is completely dry.
6. Block off the area to stop vehicles from driving into or through the spill.
7. Once absorbents have had time to work, sweep it up into a shovel and place it in a covered disposal container. Mark the container as to its contents.
8. Notify the Maintenance Supervisor, as appropriate, for replacement of any spill kit materials or absorbents.

#### Spill Cleanup and Mitigation for Spills that will warrant the use of more than 3 bags of absorbent



1. Spill responder is to call the Plant Manager to explain the nature of the spill, the location of the spill and what type of product was spilled.
2. The spill responder is to follow the procedures listed above.
3. The Plant Manager is to assess the situation. If more than 40 gallons has been spilled or the spill has reached a sewer, all regulatory reporting is the responsibility of the Plant Manager.

#### Spill Cleanup and Mitigation for Spills Outside of Our Training and Experience

1. Spill responder is to call the Plant Manager to explain the nature of the spill, the location of the spill and what type of product was spilled.
2. The spill responder is to follow the procedures listed above, that can be safely completed. The spill responder must monitor the situation, and if necessary call 911 if the threat of the spill should change.
3. The Plant Manager is to assess the situation. If the spill is outside of the training and experience of Tulip Molded Plastics Corporation personnel, an emergency response cleanup contractor will be contacted to collect the spilled material in the appropriate manner and place the material into secure containers.
4. The area or surface in contact with the spilled material will be decontaminated by an appropriate method permissible under local, state, and federal laws. The method used depends upon the substance, the availability of permitted sewer discharge to a local publicly owned treatment works (POTW), regulatory standards applicable to hazardous and toxic wastes, and other factors. The emergency response cleanup contractor, in consultation with Tulip Molded Plastics Corporation management, will select the appropriate cleanup and decontamination method after determining the applicable facts.
5. Spill material and debris will be managed in a manner fully compliant with applicable local, state, and federal laws regarding recycling or disposal of wastes. All regulatory reporting is the responsibility of Tulip Molded Plastics Corporation.

#### Disposal of Recovered Materials

- Disposal of materials recovered after cleanup of a spill or leak is directed by the Plant Manager in accordance with applicable federal and state regulations and requirements.





## 1.0 Purpose

- 1.1 To provide a system and guidelines for the handling, storage, labeling, and disposal of environmentally sensitive and recyclable materials.

## 2.0 Scope

- 2.1 Applies to lighting, industrial absorbents, contaminated water, spray booth waste, lead, oil, and recyclable papers.

## 3.0 Responsibility

- 3.1 Plant and maintenance management are responsible for the safe handling of environmentally sensitive and recyclable materials.
- 3.2 Maintenance department and other designated personnel will handle environmentally sensitive materials.
- 3.3 All Tulip Corporation personnel are participants in the paper recycling program.

## 4.0 Definitions

- 4.1 **Environmentally Sensitive** – Items and materials that are regulated by Federal, State or Local authorities, as well as, those that may pose health hazards to Tulip Corporation employees. Also any materials called or classified as hazardous waste.
- 4.2 **Recyclables** – Items and materials for which recycling is mandated by State or Local authorities and other items that Tulip Corporation has found an outside market.
- 4.3 **Cold Form Department** – Defined by the area in the plant where the cold form equipment is located. This includes the area by the extrusion press, cold form lines, cold heading line, and the cold form crib.

## 5.0 Procedure

### 5.1 General Information

- 5.1.1 All materials are picked up and disposed of by licensed and insured disposal contractors. These contractors will generally provide containers for the storage of the material until pick up.
- 5.1.2 A record and receipt of the pick up and shipment of the material is made and kept on file.

### 5.2 General Trash

- 5.2.1 Receptacles for everyday trash are located through out the plant and office. This cannot include anything that is contaminated or mixed with lead. This is not to include any of the recyclable materials listed below. To discard trash take to north end of warehouse, open overhead door and dump into dumpster.





### **5.3 Plastics**

- 5.3.1 All Polypropylene material from presses is to be placed in “Scrap for Grinding” bins throughout the molding department and recycled in molding process.
- 5.3.2 Plastic banding from cardboard bundles and bottles should be placed in the appropriate marked bins. In the Cold Form Department there is a 55 gallon black metal drum for plastic.
- 5.3.3 When the bins or drum is filled, they should be is emptied into the plastic recycling gaylord in the north end of the warehouse.

### **5.4 Metal banding**

- 5.4.1 There are 55 gallon black metal drum located throughout the plant for the disposal of the metal banding from the skids and lead ingot skids. Banding should be cut with metals cutters attached to each drum into smaller strips.
- 5.4.2 When the drum is filled it should be dumped into the metal recycling gaylord in the north end of the warehouse.

### **5.5 Aluminum**

- 5.5.1 Aluminum cans and other recyclable aluminum should be placed in the appropriate marked bins.

### **5.6 Cardboard**

- 5.6.1 Clean scrap cardboard should be placed in the large gray plastic bins marked “Scrap Cardboard Only” located throughout the plant.
- 5.6.2 When the bins are full they need to be dumped into the cardboard compactor located in the north end of the warehouse.

### **5.7 Lighting**

- 5.7.1 This includes fluorescent lamps, incandescent lamps and high intensity discharge lamps such as high-pressure sodium vapor, metal halide and mercury vapor.
- 5.7.2 Spent lamps are stored in a plastic container in the boiler room. Only designated personnel will place removed lamps in the storage container.
- 5.7.3 When the container is full, maintenance management will arrange for pick-up and disposal.

### **5.8 Industrial Absorbents**

- 5.8.1 This includes such items as oil socks and booms, barrel pads and mats.



5.8.2 Spent absorbents are stored in a 55-gallon drum with a sealable cover. The drum will be labeled indicating the material stored inside. Only designated personnel will place absorbents in the drum.

5.8.3 When the drum is full, maintenance management will arrange for pick-up and disposal.

## 5.9 Dross Disposal

5.9.1 Dross removed from the melting furnace or casting machine must be placed in 55 gallon or 30 gallon steel drums.

5.9.2 Lead contaminated with hydraulic oil should be placed in the 55 gallon or 30 gallon steel drums.

5.9.3 Drums are to be 1A2 bolt ring top drums.

5.9.4 Dross drums must be free of lead on the outside of the drum before they leave the facility.

5.9.5 Every dross drum must be identified with two labels.

5.9.6 A "Material for Recycle" label must be filled out and attached to outside of drum. Information must be legible. See Figure 1.

5.9.6.1 The Company **NAME, ADDRESS, CITY, STATE** and **ZIP** should be completed.

5.9.6.2 After **CONTENTS** write "**LEAD DROSS**".

5.9.6.3 A "**DOT**" identification label must also be attached to outside of drum. Label must be **#9, UN-3077**. See Figure 3.

5.4.7 Labels can be purchased from Nelson Electric or other label suppliers.

## 5.10 Waste Water Disposal

5.10.1 Waste water used to clean floor or machine must be disposed of as hazardous waste in 55 gallon or 30 gallon steel drums.

5.10.2 Drums are to be 1A2 bolt ring top drums.

5.10.3 Every waste water drum must be identified with two labels.

5.10.4 A "Hazardous Material" label must be filled out and attached to outside of drum. Information must be legible. See Figure 2.

5.10.4.1 The Company **NAME, ADDRESS, CITY, STATE** and **ZIP** should be completed.

5.10.4.2 In the Bracketed area write "**WASTE WATER**"

5.10.4.3 A "**DOT**" identification label must also be attached to outside of drum. Label must be **#9, UN-3082**. See Figure 4.

5.10.5 Labels can be purchased from Nelson Electric or other label suppliers.





5.10.6 All waste water will be evaporated and the remaining residue will be added to the “Dross” containers for recycling.

### 5.11 Contaminated Waste Disposal

5.11.1 Contaminated Waste consists of any garbage that is mixed or contaminated with lead. This to include but not limited to:

5.11.1.1 Oil dry from floor mixed with lead

5.11.1.2 Dirt from floor mixed with lead.

5.11.1.3 Used knit gloves worn by cold form employees.

5.11.1.4 Used filters from baghouse.

5.11.1.5 Used filter bags from baghouse.

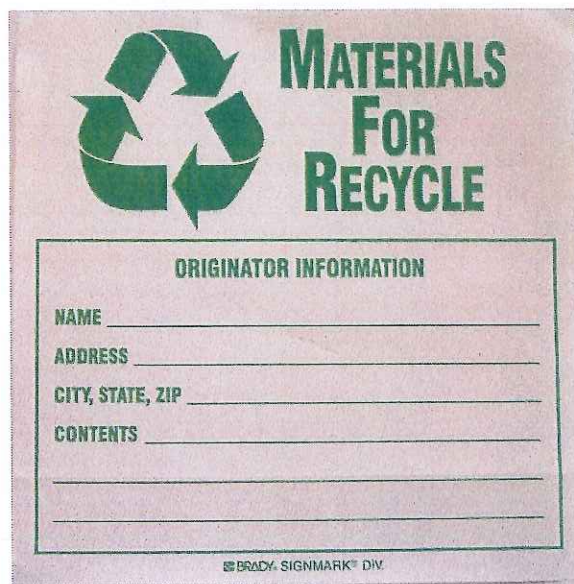
5.11.2 Every Contaminated Waste drum must be identified with two labels.

5.11.3 A “Material for Recycle” label must be filled out and attached to outside of drum. Information must be legible. See Figure 1.

5.11.3.1 The Company **NAME, ADDRESS, CITY, STATE** and **ZIP** should be completed.

5.11.3.2 After **CONTENTS** write **“CONTAMINATED WASTE”**.

5.11.3.3 A **“DOT”** identification label must also be attached to outside of drum. Label must be **#9, UN-3077**. See Figure 3.



**MATERIALS  
FOR  
RECYCLE**

**ORIGINATOR INFORMATION**

NAME \_\_\_\_\_

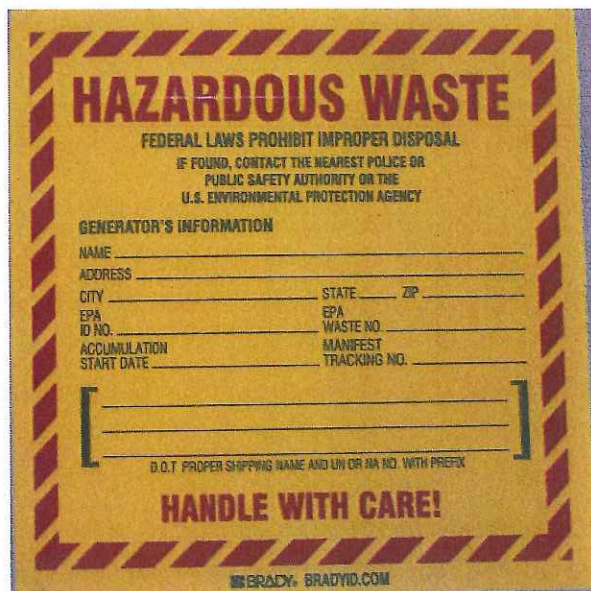
ADDRESS \_\_\_\_\_

CITY, STATE, ZIP \_\_\_\_\_

CONTENTS \_\_\_\_\_

BRADY SIGNMARK DIV.

FIGURE 1



**HAZARDOUS WASTE**

FEDERAL LAWS PROHIBIT IMPROPER DISPOSAL  
IF FOUND, CONTACT THE NEAREST POLICE OR  
PUBLIC SAFETY AUTHORITY OR THE  
U.S. ENVIRONMENTAL PROTECTION AGENCY

**GENERATOR'S INFORMATION**

NAME \_\_\_\_\_

ADDRESS \_\_\_\_\_

CITY \_\_\_\_\_ STATE \_\_\_\_\_ ZIP \_\_\_\_\_

EPA ID NO. \_\_\_\_\_ EPA WASTE NO. \_\_\_\_\_

ACCUMULATION \_\_\_\_\_ MANIFEST \_\_\_\_\_

START DATE \_\_\_\_\_ TRACKING NO. \_\_\_\_\_

D.O.T. PROPER SHIPPING NAME AND UN OR HM NO. WITH PREFIX

**HANDLE WITH CARE!**

BRADY BRADYID.COM

FIGURE 2





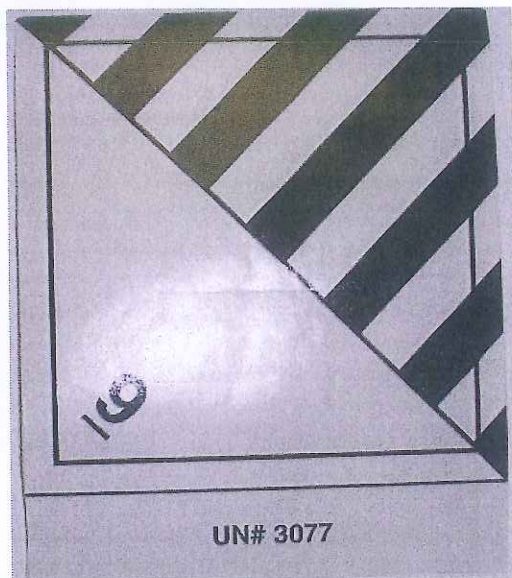


**Tulip  
Corporation**  
Department  
Work Instruction

**HANDLING/DISPOSAL – SENSITIVE  
AND RECYCLABLE ITEMS**

Document Number  
**DWI-0501**

Rev. Level:  
**02**



**FIGURE 3**



**FIGURE 4**

#### **5.12 Waste Oil**

- 5.12.1 Waste hydraulic oil collected from the cold form machines that is not contaminated with foreign substances is to be recycled internally.
- 5.12.2 This waste oil can be dumped into the recycling tank located in the Maintenance storage area or put into the Maintenance waste oil pickup cart.
- 5.12.3 Waste oil that is contaminated with foreign substances needs to be disposed of in the waste oil container located in the cold form department. This container is labeled Mobil Oil.

#### **5.13 Oil Contaminated Water**

- 5.13.1 This includes any water mixed with machine, industrial or cutting oils.
- 5.13.2 The contaminated water is stored in a sealed 450-gallon steel tank located in the boiler room. Only designated personnel will transfer contaminated water to this tank.
- 5.13.3 When the tank is full, maintenance management will arrange to have the tank emptied.

#### **5.14 Waste from Spray Booth**

- 5.14.1 All exhaust filters from the coating spray booth and any other waste material that may be contaminated with hardened coating material is considered non-hazardous and may be placed in dumpsters.



5.14.2 Wash tank liquid is considered hazardous material and arrangements with certified waste haulers will be made if it is necessary to drain or clean the wash tank.

**5.15 Recyclable Paper Products**

5.15.1 This includes computer paper, shredded paper, office papers and corrugated containers. All plant and corporate personnel are responsible for placing their recyclables in the containers provided.

5.15.2 These items are separated and stored in roll around bins located outside the mailroom. When full, the bins will be emptied into dumpsters located outside the shipping dock. After sufficient material is accumulated, the shipping department will arrange for pick-up and disposal.

**6.0 Reference Documents**

6.1 Federal, State and Local Regulations

6.2 **MATERIALS FOR RECYCLE Label** – Nelson Electric # 60358.

6.3 **HAZARDOUS MATERIAL Label** – Nelson Electric # 60448

6.4 **DOT Identification Label** – Nelson Electric, # CST1053-UN-3077.

6.5 **DOT Identification Label** – Nelson Electric, # CST1053-UN-3082.

**7.0 Records**

7.1 None





**Tulip  
Corporation**  
Department  
Work Instruction

**HANDLING/DISPOSAL – SENSITIVE  
AND RECYCLABLE ITEMS**

Document Number  
**DWI-0501**

Rev. Level:  
**02**

**8.0 Revision History**

Revision Date	Revision Level	Revision	Revised By	Pages
11/28/05	01	Section 8.1 & 8.2 revised to reflect current hazardous material designations and handling of spray booth materials. Section 9.2 revised to reflect new use of roll around bins and dumpsters. Shipping Department is also now responsible to arrange pick-up and disposal of paper/cardboard recyclables.	SMK	2
05/04/09	02	Rewritten and updated to new format. Combined WI #M7.5.1.005 and M7.5.1.303	DeFrain	ALL

**9.0 Approval Signature**

QUALITY

DATE 05/09/09

MILWAUKEE  
MANUFACTURING

DATE 5-8-09







# Spartan Chemical Company, Inc.

## Material Safety Data Sheet

### SECTION I: PRODUCT INFORMATION

Product Name or Number (as it appears on label):  
**ORANGE TOUGH 40**  
Product Number: 2240

Product Division:  
Janitorial

Spartan Chemical Company, Inc.  
1110 Spartan Drive  
Maumee OH 43537

Product/Technical Information: 1-(800)-537-8990  
Medical Emergency: 1-(888)-314-6171 (24 hours)  
Chemical Leak/Spill Emergency: CHEMTREC 1-(800) 424-9300 (24 hours)

Shipping Description: Non Hazardous Products

NFPA Ratings:	HMIS Ratings:
Health: 2 - Moderate Fire: 2 - Moderate Reactivity: 0 - Minimal	Health: 2 - Moderate Fire: 2 - Moderate Reactivity: 0 - Minimal Pers. Prot. Equip.: See Section VIII

### SECTION II: HAZARDOUS INGREDIENTS

(Listed when present at 1% or greater, carcinogens at 0.1% or greater) All component chemicals are listed or exempted from listing on the "TSCA Inventory" of chemical substances maintained by the U.S. Environmental Protection Agency.

Chemical Name(s)	%Wt	CAS Registry No.	Table Z-1-A			NTP, IARC or OSHA Carcinogen
			TWA mg/m <sup>3</sup>	STEL mg/m <sup>3</sup>	CEILING mg/m <sup>3</sup>	
d-limonene	35-40	5989-27-5	Not Established	Not Established	Not Established	No
Nonyl phenol ethoxylate	10-15	127087-87-0	Not Established	Not Established	Not Established	No
Triethanolamine	05-10	27323-41-7	Not Established	Not Established	Not Established	No
dodecylbenzenesulfonate	-	-	-	-	-	-
Triethanolamine	05-10	102-71-6	5 (ACGIH)	Not Established	Not Established	No
Hexylene glycol	01-05	107-41-5	Not Established	Not Established	121 (NIOSH)	No
Dicarboxylic fatty acid, dipotassium salt	01-05	66375-37-9	Not Established	Not Established	Not Established	No
Tetrasodium ethylene diaminetetraacetate	01-05	64-02-8	Not Established	Not Established	Not Established	No
	-	-	-	-	-	-

### SECTION III: PHYSICAL DATA

Boiling Point: >212 °F	Vapor Pressure: Unknown
Vapor Density (AIR = 1): Unknown	Solubility in Water: Emulsifiable
pH: 9.0	Specific Gravity (H <sub>2</sub> O=1): 0.96
Evaporation Rate (but.ace.=1): <1	Percent Solid by Weight: 20-25
Physical State: Liquid	
Appearance & Odor: Clear, orange liquid. Orange citrus fragrance.	



#### SECTION IV: FIRE & EXPLOSIVE HAZARD DATA

Flash Point: 124°F	Method Used: ASTM-D56
Flammable Limits: Unknown	Flame Extension: N/A
Extinguishing Media: Foam, dry chemical, carbon dioxide, water fog or spray	
Special Fire Fighting Procedures: Wear NIOSH approved self-contained breathing apparatus and protective clothing. Cool fire-exposed containers with water spray.	
Unusual Fire & Explosive Hazards: Combustible liquid and vapor. Keep away from heat, sparks or flame. Combustion products are toxic.	

#### SECTION V: HEALTH HAZARD DATA

Threshold Limit Value: Not Established	Primary Routes of Entry: Inhalation, Skin Contact, Eyes and Oral
Effects of Overexposure- <b>Causes eye irritation:</b> Symptoms may include pain, redness and swelling of the conjunctiva.	
Conditions to Avoid: <b>Causes skin irritation:</b> Symptoms may include redness, pain and swelling.	
<b>Harmful if swallowed:</b> Symptoms may include pain, nausea, vomiting and diarrhea.	
<b>Breathing product vapors or mist may cause respiratory irritation:</b> Symptoms may include nasal discomfort and coughing. Contains d-limonene, hexylene glycol and triethanolamine which may cause skin sensitization with repeated contact. Repeated overexposure to triethanolamine may cause liver and kidney damage.	
<b>Avoid contact with eyes, skin and clothing. Avoid breathing product vapors or mists. Do not swallow. Use with adequate ventilation. Wash thoroughly after handling.</b>	
Conditions Aggravated by Use: Use of this product may aggravate preexisting skin; eye and respiratory disorders including asthma and dermatitis.	
Emergency & First Aid Procedures:	
Eyes: Flush eyes with water for at least 15 minutes. Remove contact lenses. Get medical attention.	
Skin: Remove contaminated clothing. Flush skin with water for at least 15 minutes. Get medical attention if irritation persists. Wash contaminated clothing before reuse.	
Ingestion: Do not induce vomiting. Drink one or two glasses of water to dilute product. Get medical attention. Do not give anything by mouth to an unconscious person.	
Inhalation: Move person to fresh air. Get medical attention if irritation persists.	

#### SECTION VI: REACTIVITY DATA

Stability: Stable	Incompatible Materials: Strong oxidants
Hazardous Decomposition Products: CO, CO <sub>2</sub>	Hazardous Polymerization: Will Not Occur

#### SECTION VII: SPILL OR LEAK PROCEDURES

Steps to be Taken in Case Material is Released or Spilled: Dike and contain spill with inert material (sand, earth, commercial absorbent, etc.) and transfer to containers for disposal. Keep spill out of storm sewers and waterways.
Waste Disposal Method: Dispose of in compliance with all federal, state and local laws and regulations.

#### SECTION VIII: SPECIAL PROTECTION INFORMATION

Respiratory Protection: Not normally required when good general ventilation is provided. However if exposure limits are exceeded (see Section II) or if respiratory irritation occurs, the use of a NIOSH approved respirator suitable for the use-conditions and chemicals listed in Section II should be considered.
Ventilation: Provide good general ventilation. Local exhaust ventilation may be necessary for some operations.
Protective Gloves(Specify Type): Rubber or other impervious gloves.
Eye Protection(Specify Type): Splash goggles are recommended to prevent eye contact.
Other Protective Equipment: See 29 CFR 1910.132-138 for further guidance.

#### SECTION IX: SPECIAL PRECAUTIONS

Precautions; Handling & Storing: Combustible liquid and vapors. Flash Point 124°F. Keep away from heat, sparks, or open flame. Keep container tightly closed. Store in a cool, dry area. Do not store above 120°F.
Other Precautions: Keep out of reach of children.

© SCC 01/09/2012  
ORANGE TOUGH 40

Name: Ronald T. Cook  
Effective Date: 01/09/2012

Title: Manager, Regulatory Affairs  
Supersedes: 09/22/2008



Ref: 29 CFR 1910.1200 (OSHA)

Changes:

General review

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# EMERGENCY ACTION PLAN

## EVACUATION ROUTES ① PRIMARY ② SECONDARY

ASSEMBLY AREAS

SHELTERS

TO ROOF  
LADDER TO GROUND  
EXIT #3

DOWN STAIRS  
TO EXIT 4

SECOND  
FLOOR

DOWN STAIRS  
TO EXIT 1

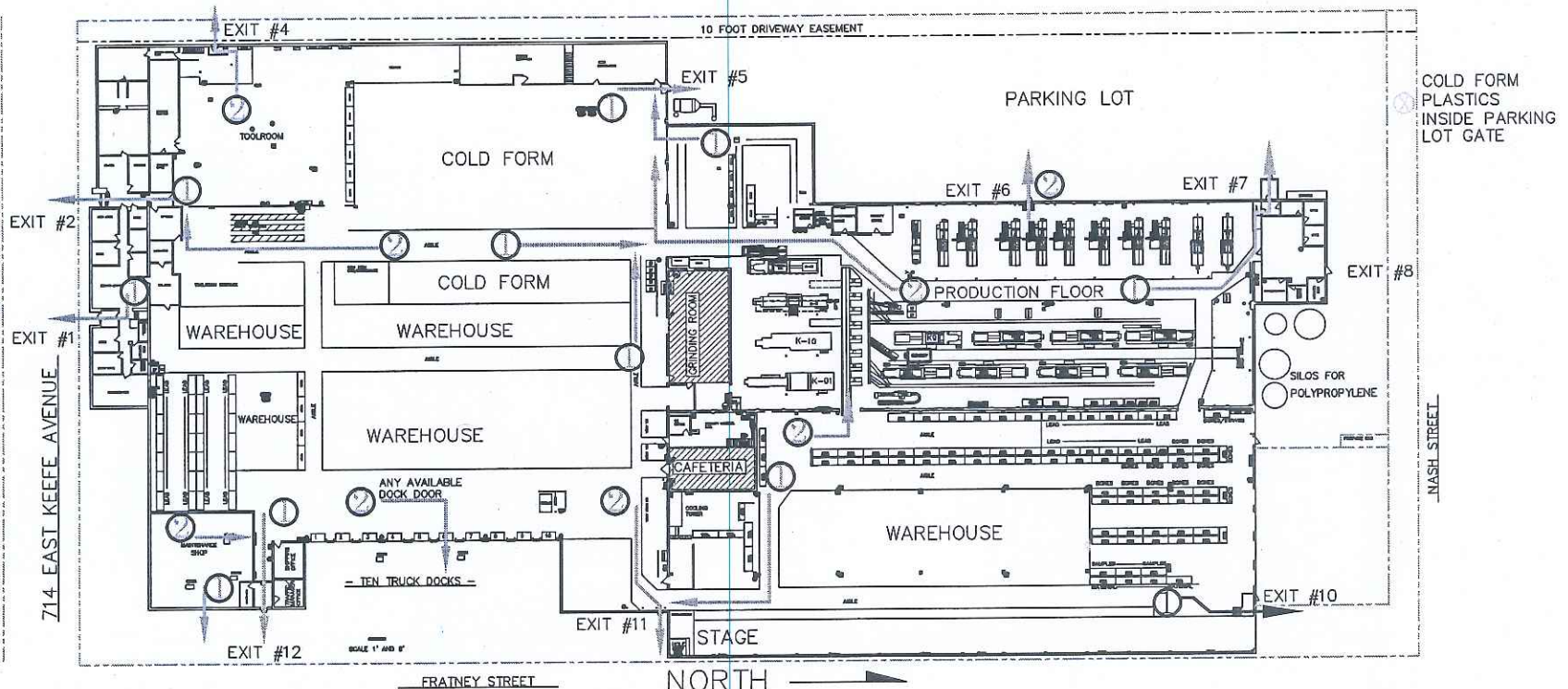
SECOND  
FLOOR

DOWN STAIRS TO  
PARKING LOT  
EXIT #13

DOWN STAIRS  
TO EXIT 7

SECOND  
FLOOR

SOUTH OFFICE  
TOOL ROOM  
INSIDE PARKING  
LOT GATE  
ACROSS KEEFE



SHIPPING  
CORNER OF FRATNEY AND KEEFE  
ACROSS STREET FROM BUILDING



02/27/2014

## Generator Activity by Date Range

Customer: 72941

From: 01/01/2013

To: 12/31/201

Generator: 73254 TULIP CORP.  
714 EAST KEEFE AVENUE  
MILWAUKEE, WI 53212

WO #:	00-005AJ51	Invoice:	12374613	Service Date :	01/30/2013			
Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
174 - FUEL SURCHARGE		1	\$16.32	\$16.32				
2778 - 80 GAL AQUEOUS LEASE	208273	1	\$755.32	\$755.32	70	72	73254-10-22	COLD FORM - 127
2778 - 80 GAL AQUEOUS LEASE	56924	1	\$686.68	\$686.68	70	72	73254-6	SPRAY BOOTH/COI
WO Totals				\$1,458.32	140	144		

WO #:	00-005AJ53	Invoice:	12374612	Service Date :	01/30/2013			
Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1634 - TANK UNIT 35 GAL	154184	1	\$366.52	\$366.52	22	27		MAINTENANCE
1634 - TANK UNIT 35 GAL	56923A	1	\$366.52	\$366.52	22	27		
1014A - 55G NON-HAZ ENERGY RE		1	\$260.50	\$260.50			73254-2	
WO Totals				\$993.54	52	54		

WO #:	00-005E4LC	Invoice:	12411302	Service Date :	03/01/2013	Reimbursement: Check		
Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1110 - FUEL SURCHARGE - VAC		1	\$30.00	\$30.00				
1103 - VAC TRUCK STOP FEE (31		1	\$161.98	\$161.98				
1101 - VAC LIQUID PICKUP		720	\$0.84	\$604.60				
WO Totals				\$796.78				

WO #:	00-005DY6D	Invoice:	12428895	Service Date :	03/19/2013			
Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
2778 - 80 GAL AQUEOUS LEASE	208273	1	\$755.32	\$755.32	70	72	73254-10-22	COLD FORM - 127
WO Totals				\$755.32	70	72		

WO #:	00-005DY6E	Invoice:	12428896	Service Date :	03/19/2013			
Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
2778 - 80 GAL AQUEOUS LEASE	56924	1	\$686.68	\$686.68	60	72	73254-6	SPRAY BOOTH/COI
WO Totals				\$686.68	60	72		

WO #:	00-005DY6G	Invoice:	12428897	Service Date :	03/19/2013			
Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1634 - TANK UNIT 35 GAL	154184	1	\$366.52	\$366.52	25	27		MAINTENANCE
1634 - TANK UNIT 35 GAL	56923A	1	\$366.52	\$366.52	28	27		
1014A - 55G NON-HAZ ENERGY RE		2	\$260.50	\$521.00			73254-2	
1256 - 55 GAL DRUM OPEN		2	\$55.00	\$110.00				
WO Totals				\$1,364.04	53	54		

WO #:	00-005J919	Invoice:	12470576	Service Date :	04/23/2013	Reimbursement: Check		
Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1110 - FUEL SURCHARGE - VAC		1	\$33.00	\$33.00				





02/27/2014

## Generator Activity by Date Range

Customer:

72941

	From: 01/01/2013	To: 12/31/201
1103 - VAC TRUCK STOP FEE (31	1	\$177.18
1101 - VAC LIQUID PICKUP	1,200	\$0.92
	<b>WO Totals</b>	<b>\$1,314.18</b>

**WO #:** 00-005K3P7      **Invoice:** 12486701      **Service Date :** 05/01/2013

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1081A - 55G WASTE UPCHARGE		3	\$305.00	\$915.00				
1091 - WASTE PROFILE		1	\$125.00	\$125.00				
		<b>WO Totals</b>		<b>\$1,040.00</b>				

**WO #:** 00-005K5XW      **Invoice:** 12486703      **Service Date :** 05/02/2013

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
2778 - 80 GAL AQUEOUS LEASE	56924	1	\$686.68	\$686.68	80	72	73254-6	SPRAY BOOTH/COI
		<b>WO Totals</b>		<b>\$686.68</b>	<b>80</b>	<b>72</b>		

**WO #:** 00-005K5Y0      **Invoice:** 12486702      **Service Date :** 05/02/2013

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
174 - FUEL SURCHARGE		1	\$17.14	\$17.14				
1085 - STANDARD WASTE PROFI		1	\$90.00	\$90.00				
1070P - PICKUP 4FT LT BULBS		1	\$0.00	\$0.00				
1070 - 4'DM LIGHTBULB DISP		1	\$93.00	\$93.00			73254-10-13	
1052A - 55G OILFILTER RECYCLE		1	\$179.00	\$179.00			73254-10-3	
		<b>WO Totals</b>		<b>\$379.14</b>				

**WO #:** 00-005KLHM      **Invoice:** 12494353      **Service Date :** 05/09/2013

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1014A - 55G NON-HAZ ENERGY RE		3	\$260.00	\$780.00			73254-2	
1014A - 55G NON-HAZ ENERGY RE		2	\$260.00	\$520.00			73254-14	
		<b>WO Totals</b>		<b>\$1,300.00</b>				

**WO #:** 00-005L1DW      **Invoice:** 12502133      **Service Date :** 05/15/2013      **Reimbursement:** Check

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1110 - FUEL SURCHARGE - VAC		1	\$30.00	\$30.00				
1103 - VAC TRUCK STOP FEE (31		1	\$161.98	\$161.98				
1101 - VAC LIQUID PICKUP		1,050	\$0.84	\$882.00				
		<b>WO Totals</b>		<b>\$1,073.98</b>				

**WO #:** 00-005JEGT      **Invoice:** 12507009      **Service Date :** 05/22/2013

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1478 - ORANGE DEGREASER 55G		1	\$345.00	\$345.00				
2778 - 80 GAL AQUEOUS LEASE	56924	1	\$686.68	\$686.68	80	72	73254-6	SPRAY BOOTH/COI
		<b>WO Totals</b>		<b>\$1,031.68</b>	<b>80</b>	<b>72</b>		

**WO #:** 00-005JEGV      **Invoice:** 12507010      **Service Date :** 05/22/2013

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1634 - TANK UNIT 35 GAL	154184	1	\$366.52	\$366.52	25	27		MAINTENANCE
1634 - TANK UNIT 35 GAL	56923A	1	\$366.52	\$366.52	25	27		



02/27/2014

## Generator Activity by Date Range

Customer:

72941

From: 01/01/2013

To: 12/31/2013

WO Totals

\$733.04

50

54

WO #: 00-005JEGD

Invoice:

12529010

Service Date :

06/10/2013

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1014A - 55G NON-HAZ ENERGY RE		2	\$287.00	\$574.00			73254-14	
1014A - 55G NON-HAZ ENERGY RE		1	\$287.00	\$287.00			73254-2	
WO Totals				\$861.00				

WO #: 00-004V60T

Invoice:

12168807

Service Date :

06/16/2013

Reimbursement: Check

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1110 - FUEL SURCHARGE - VAC		-1	\$30.00	-\$30.00				
1103 - VAC TRUCK STOP FEE (3 I		-1	\$161.98	-\$161.98				
1101 - VAC LIQUID PICKUP		-600	\$0.84	-\$504.00			73254-10-54	
WO Totals				-\$695.98				

WO #: 00-004YGND

Invoice:

12139061

Service Date :

06/16/2013

Reimbursement: Check

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1110 - FUEL SURCHARGE - VAC		-1	\$30.00	-\$30.00				
1103 - VAC TRUCK STOP FEE (3 I		-1	\$155.00	-\$155.00				
1101 - VAC LIQUID PICKUP		-300	\$0.95	-\$285.00				
WO Totals				-\$470.00				

WO #: 00-0053G5G

Invoice:

12207169

Service Date :

06/16/2013

Reimbursement: Check

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1110 - FUEL SURCHARGE - VAC		-1	\$30.00	-\$30.00				
1103 - VAC TRUCK STOP FEE (3 I		-1	\$161.98	-\$161.98				
1101 - VAC LIQUID PICKUP		-780	\$0.84	-\$655.20				
WO Totals				-\$847.18				

WO #: 00-0055A9T

Invoice:

12244620

Service Date :

06/16/2013

Reimbursement: Check

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1110 - FUEL SURCHARGE - VAC		-1	\$30.00	-\$30.00				
1103 - VAC TRUCK STOP FEE (3 I		-1	\$161.98	-\$161.98				
1102 - VAC SOLIDS PICKUP		-60	\$2.92	-\$175.20				
1101 - VAC LIQUID PICKUP		-494	\$0.84	-\$414.96				
WO Totals				-\$782.14				

WO #: 00-005J919

Invoice:

12470576

Service Date :

06/16/2013

Reimbursement: Check

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1110 - FUEL SURCHARGE - VAC		-1	\$33.00	-\$33.00				
1103 - VAC TRUCK STOP FEE (3 I		-1	\$177.18	-\$177.18				
1101 - VAC LIQUID PICKUP		-1,200	\$0.92	-\$1,104.00				
WO Totals				-\$1,314.18				

WO #: 00-005PJC1

Invoice:

12567850

Service Date :

06/16/2013

Reimbursement: Check

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1103 - VAC TRUCK STOP FEE (3 I		1	\$161.98	\$161.98				





02/27/2014

## Generator Activity by Date Range

Customer:

72941

From: 01/01/2013

To: 12/31/2013

WO #: 00-005N2PW Invoice: 12572747 Service Date: 07/17/2013

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
2778 - 80 GAL AQUEOUS LEASE	56924	1	\$686.68	\$686.68	70	72	73254-6	SPRAY BOOTH/COI
WO Totals				\$686.68	70	72		

WO #: 00-005RVEV Invoice: 12590719 Service Date: 07/31/2013 Reimbursement: Check

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1110 - FUEL SURCHARGE - VAC		1	\$30.00	\$30.00				
1103 - VAC TRUCK STOP FEE (31		1	\$161.98	\$161.98				
1101 - VAC LIQUID PICKUP		1,000	\$0.84	\$840.00				
WO Totals				\$1,031.98				

WO #: 00-005N2PX Invoice: 12615883 Service Date: 08/20/2013

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1634 - TANK UNIT 35 GAL	154184	1	\$366.52	\$366.52	25	27		MAINTENANCE
1634 - TANK UNIT 35 GAL	56923A	1	\$366.52	\$366.52	25	27		
1014A - 55G NON-HAZ ENERGY RE		1	\$260.50	\$260.50			73254-2	
WO Totals				\$993.54	50	54		

WO #: 00-005TN6L Invoice: 12624391 Service Date: 08/29/2013 Reimbursement: Check

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1110 - FUEL SURCHARGE - VAC		1	\$33.00	\$33.00				
1103 - VAC TRUCK STOP FEE (31		1	\$178.18	\$178.18				
1101 - VAC LIQUID PICKUP		800	\$0.92	\$736.00				
WO Totals				\$947.18				

WO #: 00-005SM7M Invoice: 12632335 Service Date: 09/04/2013

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
2778 - 80 GAL AQUEOUS LEASE	208273	1	\$755.32	\$755.32	70	72	73254-10-22	COLD FORM - 127
WO Totals				\$755.32	70	72		

WO #: 00-005SM7N Invoice: 12632336 Service Date: 09/04/2013

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
174 - FUEL SURCHARGE		1	\$15.91	\$15.91				
2778 - 80 GAL AQUEOUS LEASE	56924	1	\$686.68	\$686.68	60	72	73254-6	SPRAY BOOTH/COI
WO Totals				\$702.59	60	72		

WO #: 00-005V4SL Invoice: 12632334 Service Date: 09/04/2013

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1256 - 55 GAL DRUM OPEN		4	\$45.00	\$180.00				
1014A - 55G NON-HAZ ENERGY RE		1	\$287.00	\$287.00			73254-2	
1014A - 55G NON-HAZ ENERGY RE		1	\$287.00	\$287.00			73254-7	
WO Totals				\$754.00				

WO #: 00-005V6AK Invoice: 12636852 Service Date: 09/06/2013

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
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02/27/2014

## Generator Activity by Date Range

Customer: 72941

1014A - 55G NON-HAZ ENERGY RE

From: 01/01/2013

To: 12/31/2013

1 \$287.00

\$287.00

73254-2

WO Totals

\$287.00

WO #: 00-005Y1T3

Invoice:

12686697

Service Date :

10/15/2013

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1231 - 30 GAL DM EMTY		8	\$49.00	\$392.00				
WO Totals				\$392.00				

WO #: 00-005XEHR

Invoice:

12719088

Service Date :

11/08/2013

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1478 - ORANGE DEGREASER 55G		1	\$345.00	\$345.00				
1634 - TANK UNIT 35 GAL	154184	1	\$394.01	\$394.01	22	27		MAINTENANCE
1634 - TANK UNIT 35 GAL	56923A	1	\$394.01	\$394.01	22	27		
WO Totals				\$1,133.02	44	54		

WO #: 00-0060R52

Invoice:

12728547

Service Date :

11/08/2013

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
2778 - 80 GAL AQUEOUS LEASE	56924	1	\$738.18	\$738.18	60	72	73254-6	SPRAY BOOTH/COL
2778 - 80 GAL AQUEOUS LEASE	208273	1	\$811.97	\$811.97	60	72	73254-10-22	COLD FORM - 127
WO Totals				\$1,550.15	120	144		

WO #: 00-0062EJ9

Invoice:

12779788

Service Date :

12/30/2013

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
174 - FUEL SURCHARGE		1	\$15.91	\$15.91				
1014A - 55G NON-HAZ ENERGY RE		1	\$308.53	\$308.53			73254-7	
WO Totals				\$324.44				

WO #: 00-0062EJS

Invoice:

12779790

Service Date :

12/30/2013

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
2778 - 80 GAL AQUEOUS LEASE	208273	1	\$811.97	\$811.97	70	72	73254-10-22	COLD FORM - 127
WO Totals				\$811.97	70	72		

WO #: 00-0062EJT

Invoice:

12779789

Service Date :

12/30/2013

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
2778 - 80 GAL AQUEOUS LEASE	56924	1	\$738.18	\$738.18	70	72	73254-6	SPRAY BOOTH/COL
WO Totals				\$738.18	70	72		

WO #: 00-0062EJV

Invoice:

12779791

Service Date :

12/30/2013

Product	Unit #	Qty	Price	Total Cost	Ret Gals	Gals Sold	WS #	Equipment Area
1634 - TANK UNIT 35 GAL	154184	1	\$394.01	\$394.01	25	27		MAINTENANCE
1634 - TANK UNIT 35 GAL	56923A	1	\$394.01	\$394.01	25	27		
1014A - 55G NON-HAZ ENERGY RE		1	\$280.04	\$280.04			73254-2	
WO Totals				\$1,068.06	50	54		
Generator Totals				\$28,280.97	1,309	1,386		

